

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

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1 Introduction

- 1.1** As part of the preparation of the Local Plan the Council is required to carry out a Sustainability Appraisal (SA). The overarching aim of the Sustainability Appraisal process is to ensure better decision making and planning. SA is an iterative process which has been undertaken alongside, and informed, preparation of the Local Plan.
- 1.2** Sustainability Appraisal is a process for assessing the social, economic and environmental impacts of a plan and aims to ensure that sustainable development (a term which is explained in the National Planning Policy Framework (NPPF)) is at the heart of the plan-making process. It is a legal requirement that the Local Plan is subject to SA, under the Planning and Compulsory Purchase Act 2004. In line with good practice, the SA undertaken by the Council has included the Strategic Environmental Assessment (SEA) necessary to comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004). Both the SA and the SEA requirements are incorporated in the Council's Sustainability Appraisal process.

SA production

- 1.3** Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that Councils make available a final SA report upon adoption of the Local Plan as soon as is reasonably practicable.
- 1.4** [The Final Sustainability Appraisal 2017 \(CORE/07\)](#) was submitted alongside the Local Plan for examination. This document brought together all sustainability appraisal work that was produced up to the submission of the Local Plan (Huntingdonshire Local Plan to 2036: Proposed Submission). These stages included:
- Sustainability Appraisal Scoping Report 2012
 - Initial Sustainability Appraisal 2012 and 2013
 - Environmental Capacity Study 2013 and Additional Sites Assessment 2013
 - Housing and Economic Land Availability Assessment: Additional Sites Consultation 2016
 - Huntingdonshire's Local Plan to 2036: Wind Energy Developments 2016
 - Housing and Economic Land Availability Assessment: October 2017 and December 2017
 - Draft Final Sustainability Report 2017
- 1.5** During the Local Plan Examination a further [Sustainability Appraisal Explanatory Note \(EXAM/03\)](#) was also produced. This document set out more details on the reasonable alternatives that were considered during the preparation of the Local Plan and how the choices put forward in the Proposed Submission Local Plan were selected.
- 1.6** Local Plan examination hearings were held from 17 July to 27 September 2018. matter 1 focused specifically on the Sustainability Appraisal but it was also discussed at length during Matter 3 regarding the development strategy. Following the close of these hearing sessions the Planning Inspector wrote to the Council identifying a number of main modifications to the Local Plan necessary to make the Plan 'sound' and legally compliant. The proposed main modifications were consulted on alongside the Proposed Main Modifications 2018 Sustainability Appraisal between 10 December 2018 and 29 January 2019, which is considered as a subsequent stage of sustainability appraisal in the Local Plan appraisal process.
- 1.7** This Sustainability Appraisal Post-Adoption Statement also forms part of the Council's SA and incorporates the final SA implications of the Plan following the Proposed Main Modifications Consultation, the issuing of the Inspector's final letter and report and adoption of the Local Plan at Full Council on 15 May 2019.
- 1.8** Therefore, the list of final documents that comprise the SA are:

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- Sustainability Appraisal Scoping Report 2012
- Initial Sustainability Appraisal 2013
- Environmental Capacity Study: Additional site assessments 2013
- Housing and Economic Land Availability Assessment: Additional Sites Consultation 2016
- Huntingdonshire's Local Plan to 2036: Wind Energy Developments 2016
- Draft Final Sustainability Report 2017
- Final Sustainability Report 2017
- Sustainability Appraisal Explanatory Note 2018
- Proposed Main Modifications Sustainability Appraisal 2018
- Sustainability Appraisal Post-Adoption Statement 2019

What is a post-adoption statement?

- 1.9** Regulation 16 of The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) sets out post-adoption procedures and requires that, as soon as reasonably practicable after the adoption of the Local Plan, the planning authority must make a copy of the plan publicly available alongside a copy of the final SA report and an 'SEA adoption statement'. It must also inform the public and statutory consultation bodies about the availability of these documents. The statutory consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.10** The post-adoption statement must explain and include the following:
- How environmental (and sustainability) considerations have been integrated into the plan.
 - How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
 - How the opinions expressed by the public, consultation bodies and (where appropriate) other European Member States during consultation on the plan and the Environmental/SA Report have been taken into account.
 - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered.
 - The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.
- 1.11** This document is the Sustainability Appraisal Post-Adoption Statement for the Huntingdonshire Local Plan to 2036, which was adopted on 15 May 2019 at Full Council.

How environmental and sustainability considerations have been integrated into the Local Plan 2

2 How environmental and sustainability considerations have been integrated into the Local Plan

2.1 The Sustainability Appraisal of the Huntingdonshire Local Plan to 2036 commenced in February 2012 with preparation of the Scoping Report prior production of the Initial Issues and Options for the Huntingdonshire Local Plan to 2036. Sustainability Appraisal of the plan was undertaken by Huntingdonshire District Council. The various stages of SA production are set out below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

2.2 Known as the 'scoping stage' the purpose of this stage was to establish the context for sustainability appraisal by assembling the evidence needed to inform the appraisal. This involved collecting baseline information from which to assess impacts, enable the prediction of what could happen without the plan and with the alternative options and enable future monitoring. The Scoping Report enabled the Council to establish the framework, by setting up sustainability objectives and decision aiding questions, for undertaking the appraisal (Stage B).

2.3 Sustainability issues and problems were identified to help focus the SA and streamline the subsequent stages, including baseline information analysis, setting the SA objectives and prediction of the effects and monitoring. Table 1 below presents the SA Framework for the Huntingdonshire Local Plan, the decision aiding question used for appraising plan options and how the SEA topics (listed in Schedule 2 of the SEA Regulations) relate to these objectives.

Table 1 Sustainability Appraisal Framework

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
Land, Water and Flood Risk				
1. Minimise development on greenfield land, maximise development on previously developed land or land with the lowest agricultural value	<p>Will it enable the use of land that has previously been developed in preference to land that has not been developed?</p> <p>Will it promote development in locations that are grade 3 agricultural land or lower (including urban and non-agricultural) in preference to higher grades?</p>	<p>Is more than half the site Previously Developed Land (PDL)?</p> <p>Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural)?</p> <p>Is the site in an area where higher density development is appropriate?</p>	<p>Will it promote the use of land that has previously been developed?</p> <p>Will it promote the use of land that is classified as grade 3 agricultural land or lower (including urban and non-agricultural)?</p> <p>Will it promote development at higher densities where it is appropriate?</p>	<p>Soil</p> <p>Material Assets</p> <p>Landscape</p> <p>Population</p>

¹ See notes on site assessment and significant constraints below

2 How environmental and sustainability considerations have been integrated into the Local Plan

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
	Will it promote development in locations where higher densities are appropriate?			
2. Protect water resources (both quality and quantity)	<p>Will it direct development away from waterways that are sensitive to changes in water quality?</p> <p>Will it direct development towards locations where water treatment capacity exists or can be added to effectively?</p>	What impact will development have on water resources?	Will it promote a reduction in water consumption?	<p>Water</p> <p>Climatic Factors</p> <p>Landscape</p> <p>Human Health</p>
3. Manage and minimise all forms of flood risk (taking into account climate change)	Will it minimise risk to people and property from flooding, now and in the future?	<p>Is more than half the site located in flood zone 1, flood zone 2, flood zone 3a (with climate change allowance), flood zone 3a, or functional floodplain (flood zone 3b)?</p> <p>Is any part of the site located in a rapid inundation zone?</p> <p>Can the site incorporate SuDS?</p>	<p>Will it ensure that development has taken flood risk into account, both in terms of risk to the development and to displaced risk?</p> <p>Will it promote the use of SuDS and reduced runoff rates?</p>	<p>Water</p> <p>Climatic Factors</p> <p>Landscape</p> <p>Human Health</p>
Green Infrastructure and Open Space				

1 See notes on site assessment and significant constraints below

How environmental and sustainability considerations have been integrated into the Local Plan 2

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
4. Improve the quantity and quality of publicly accessible open and natural green space and promote the strategic green infrastructure network and links to it	Will it direct development to areas which are either well served by open space or publicly accessible green space or have the capacity for providing more open space or publicly accessible green space?	Is the site within 300m of an area of accessible natural green space over 2ha ⁽²⁾ ? Does the site present opportunities to link into and/ or form part of the Green Infrastructure Network?	Will it promote an increase in the quantity and quality of publicly accessible open space? Will it promote an increase in households that have easy access to natural green space?	Biodiversity Population Human Health Fauna Flora Landscape
Biodiversity				
5. Protect, maintain and enhance biodiversity and habitats	Will it protect, restore, create or enhance habitats?	Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS? Are protected species known to exist on the site or is there potential for protected species to exist on the site ⁽³⁾ ? ⁽⁴⁾	Will it promote the protection of sites designated for their nature conservation value? Will it promote the conservation of species, the reversal of their decline, and the enhancement of biodiversity?	Biodiversity Fauna Flora Landscape Soil Water Climatic Factors
Landscape				
6. Protect, maintain and enhance landscape and townscape character and the sense of place of our settlements	Will it promote development of a type and scale which recognises and responds to the valued	Will development have a significant impact on the surrounding townscape or landscape?	Will it promote the protection of the diversity and	Landscape Cultural Heritage Flora

- 1 See notes on site assessment and significant constraints below
- 2 Natural England ANGSt 'local' standard
- 3 with reference to [Natural England's protected species decision checklist](#)
- 4 subject to appropriate surveys being carried out

2 How environmental and sustainability considerations have been integrated into the Local Plan

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
	<p>characteristics of landscape character types?</p> <p>Will it promote development of a type and scale which recognises and responds to the valued characteristics of existing townscapes?</p>		<p>distinctiveness of landscape and townscape character?</p> <p>Will it improve the quality of urban, architectural and landscape design?</p> <p>Will it seek to minimise the potential adverse visual effects of development?</p>	<p>Fauna</p> <p>Soil</p> <p>Water</p>
Heritage				
7. Protect, maintain and enhance heritage assets, whether they are designated or not	Will it promote development which preserves and enhances the district's heritage?	Will development impact on heritage assets or their settings?	Will it promote the protection of heritage assets (including designated and non-designated) and their settings?	Cultural Heritage
Climate Change and Energy				
8. Reduce emissions of greenhouse gases and improve energy efficiency	<p>Will it lead to development that can take advantage of or enable opportunities for decentralised low carbon energy sources or networks?</p> <p>Will it promote the location of significant areas of growth where the need to travel is minimised due to the mix of employment and housing?</p>	Can development take advantage of existing or planned opportunities for decentralised low carbon energy sources or networks?	<p>Will it promote actions to tackle climate change both through adaptation and mitigation?</p> <p>Will it promote an increased proportion of energy needs being met from renewable sources?</p>	<p>Climatic Factors</p> <p>Air</p> <p>Population</p> <p>Human Health</p>

1 See notes on site assessment and significant constraints below

How environmental and sustainability considerations have been integrated into the Local Plan 2

SA Objective	Decision Aiding Questions for use in appraising options for				SEA Topics covered by SA Objective
	The Strategy	Sites ⁽¹⁾	Development Management Policies		
	Will it promote actions to tackle climate change both through adaptation and mitigation?				
Pollution					
9. Improve air quality	Will it recognise and tackle the causes of air pollution, particularly from traffic?	Is the site outside or adjacent to an air quality management area?	Covered by decision aiding questions for SA Objective 10	Air Climatic Factors Human Health	
10. Avoid unnecessary light, noise and visual pollution	Will it promote the retention of the quiet rural character of the district?	Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	Will it seek to ensure that development is not affected by or causes unreasonable impacts from light, noise, air or other forms of pollution?	Human Health Landscape	
Waste and Recycling					
11. Reduce waste production and increase reuse, recycling and composting	Will it direct development away from areas of search for waste purposes designated in the Cambridgeshire and Peterborough Minerals and Waste Local Plan?	Is the site outside areas of search for waste purposes designated in the Cambridgeshire and Peterborough Minerals and Waste LDF? Will development reduce waste production and increase reuse, recycling and composting?	Will it promote the reduction of waste throughout the lifetime (construction, use and redevelopment) of development?	Material Assets Climate Change	
Health and Well-being					

1 See notes on site assessment and significant constraints below

2 How environmental and sustainability considerations have been integrated into the Local Plan

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
12. Promote built environments that encourage and support physical activity, including extending and improving access to facilities	Covered by decision aiding questions for SA Objective 4	Is the site within 500m of an existing area of open space? ⁽⁵⁾ Is the site within 800m of an outdoor sports facility?	Will it enable people to lead healthy lifestyles, including travel choices?	Human Health Population
13. Promote accessibility of cultural and social activities	Will it promote accessibility to cultural or social activities?	Is the site within 800m of a facility where cultural or social activities can be accessed?	Will it promote accessibility of cultural or social activities?	Human Health Cultural Heritage
Population and Housing				
14. Ensure all groups in society have access to decent, appropriate and affordable accommodation	Will it promote a growth in the provision of housing to meet needs (including for affordable and traveller accommodation)?	Will the site provide an increase in residential accommodation?	Will it support the provision of housing that will meet identified needs (including for affordable and traveller accommodation)?	Population Material Assets
Deprivation, Crime and Access to Services				
15. Redress inequalities	Will it help reduce poverty and social exclusion for those areas and groups most affected?	Will development address a particular housing equality issue?	Will it promote accessibility for all members of society, including the elderly and disabled?	Population Human Health
16. Reduce and prevent crime, anti-social behaviour and the fear of crime	Will it promote a reduction in levels of crime or the fear of crime?	Will development help to make the area safer?	Will it promote development that is designed to reduce and prevent crime, anti-social behaviour and the fear of crime?	Population Material Assets

1 See notes on site assessment and significant constraints below

5 Reference to the council's Developer Contributions SPD with respect to scale of development will be had with the impact identified based on the likelihood of provision on site

How environmental and sustainability considerations have been integrated into the Local Plan 2

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
17. Improve the quality, range and accessibility of social and community services and facilities including promotion of multi-purpose design and use and efficient use of these resources	Will it facilitate access to basic services?	Is the site within 400m of a food shop? Is the site within 1km of a GP surgery/ health centre?	Will it promote accessibility of services?	Material Assets Population Human Health
Employment, Business, Retail and Tourism				
18. Improve access to satisfying work, appropriate to skills, potential and place of residence	Will it match areas of population growth to employment growth in a manner which facilitates easy access to jobs?	Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	Will it promote access to employment?	Material Assets Population
19. Positively and pro-actively encourage sustainable economic growth by improving the efficiency, competitiveness, vitality and viability of the local economy	Will it enhance Huntingdonshire as a business location and encourage inward investment?	Will the site provide opportunities for investment to create additional jobs?	Will it support economic activity in sectors targeted for growth or in the rural economy? Will it enable existing businesses to grow? Will it support the vitality and viability of established retail and service centres?	Material Assets Population
Education				
20. Ensure that the educational needs of the growing population are served locally while improving uptake of	Will it help improve the availability of training and education opportunities?	Is the site within 600m of a primary school?	Will it promote easy access to training and education?	Population

1 See notes on site assessment and significant constraints below

2 How environmental and sustainability considerations have been integrated into the Local Plan

SA Objective	Decision Aiding Questions for use in appraising options for			
	The Strategy	Sites ⁽¹⁾	Development Management Policies	SEA Topics covered by SA Objective
learning and training opportunities				
Transport Infrastructure and Commuting				
21. Reduce the need to travel and promote necessary infrastructure improvements and sustainable modes of transport (walking, cycling, and public transport)	<p>Will it reduce the need to travel?</p> <p>Will it match areas of growth to those with better or improving transport infrastructure?</p>	<p>Is the site within 400m of a bus stop?</p> <p>Is the site free of known major transport infrastructure constraints?</p> <p>Will the site support a mix of uses such as housing, employment, retail and/or community facilities?</p>	<p>Will it support and improve community and public transport?</p> <p>Will it help improve cycle routes, footpaths and bridleways?</p> <p>Will it improve accessibility by means other than the car?</p>	<p>Climate Change</p> <p>Human Health</p> <p>Air</p> <p>Population</p> <p>Material Assets</p>

2.4 To ensure that the SA covered the likely significant environmental effects of the plan and to ensure that the SA process was robust and suitably comprehensive in order to support production of the plan consultation was held on the scope of the Sustainability Appraisal between 24 February to 30 March 2012. This is explained in more detail in pages 48 to 122 of the Final Sustainability Appraisal Report 2017.

Stage B: Develop options and appraise effects

2.5 The purpose of this stage was to appraise the plan objectives, options and preferred options/policies, to propose measures for alleviating adverse effects and maximising benefits and to propose indicators for monitoring the plan's sustainability. This stage was undertaken multiple times throughout local plan process due to its iterative nature. Options, strategies, policies and sites were all tested against the SA objectives and changes made where necessary.

2.6 Stage B comprised six steps:

- **B 1: Testing the plan objectives:** Identifying potential synergies or inconsistencies between the objectives of the Local Plan, referred to as Spatial Objectives and the SA Objectives established in Stage A.
- **B 2: Develop plan options:** Developing and refining options for the development strategy, policies and site allocations for the Local Plan.
- **B 3: Predicting the effects of the plan and alternatives:** Predicting the significant effects of the plan and alternatives, whether they were economic, social or environmental.
- **B 4: Evaluate the effects of the plan and alternatives:** Evaluating the predicted effects of the plan and alternatives in order to assist in the refinement of the plan.

¹ See notes on site assessment and significant constraints below

How environmental and sustainability considerations have been integrated into the Local Plan 2

- **B 5: Consider ways of mitigating adverse effects and maximising beneficial effects:** Ensuring that adverse effects were identified and potential mitigation measures were considered.
- **B6: Propose measures to monitor the plan:** Detailing the means by which the sustainability performance of the plan could be assessed and monitoring the significant effects of implementing the plan.

2.7 The outcomes of this process are explained in more detail in pages 124 to 573 of the Final Sustainability Appraisal Report 2017.

Stage C: Preparing the Sustainability Appraisal Report

2.8 The purpose of this stage was to present the findings from Stage B in a form suitable for public consultation and use by decision makers. This presented the predicted effects of the plan, including alternatives, in a form suitable for public consultation and use by decision makers.

Stage D: Consultation and developing the plan

2.9 The purpose of this stage was to consult on the report, to appraise significant changes to the plan objectives, options and preferred options/ policies appraised in Stage B and to explain how the SA process has shaped the plan. This process allowed the public and consultation bodies an opportunity to express their opinions on the findings of the environmental report and to use it as a reference point in commenting on the plan documents. It was also an opportunity to gather more information through the opinions and concerns of the public. The environmental implications of any significant changes affecting the plan, policies, strategy and site options were assessed and taken into account throughout the process and when deciding the final format of the plan.

2.10 The outcomes of this process are explained in more detail in pages 575 to 931 of the Final Sustainability Appraisal Report 2017.

Stage E: Monitoring the implementation of the plan

2.11 The purpose of this stage was to establish ways of considering whether or not to review the plan and to enable sustainability appraisal processes for future plans. This was achieved by developing aims and methods for monitoring in order to track the environmental effects of the plan to show whether they are as predicted and to help identify any adverse effects. Appropriate responses were then identified to respond to the adverse effects. This process is explained in more detail in pages 932 to 941 of the Final Sustainability Appraisal Report 2017.

Examination of the Local Plan

2.12 In March 2018 Huntingdonshire District Council submitted the Local Plan to 2036 for independent examination by a Planning Inspector appointed by the Secretary of State. An integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Report relating to Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 was submitted alongside the Local Plan (Final Sustainability Appraisal Report 2017). Public examination hearings were held from 17 to 20 July and 10 to 27 September 2018. The hearing sessions included consideration of the adequacy of the SA process and representations were made to the Inspector on this topic, with some participants contending that the SA process was flawed because of alleged shortcomings in the consideration of reasonable alternatives. In response to the discussion on the Sustainability Appraisal during Matter 1 an Explanatory Note was prepared to clarify and synthesise the consideration of the growth strategy, approach to the distribution of growth and reasonable alternatives.

2.13 Following on from these hearings the Inspector led preparation of a list of proposed main modifications to the submitted plan. An SA Addendum (Proposed Modifications 2018 Sustainability Appraisal) was published alongside these for consultation from 10 December 2018 to 29 January 2019.

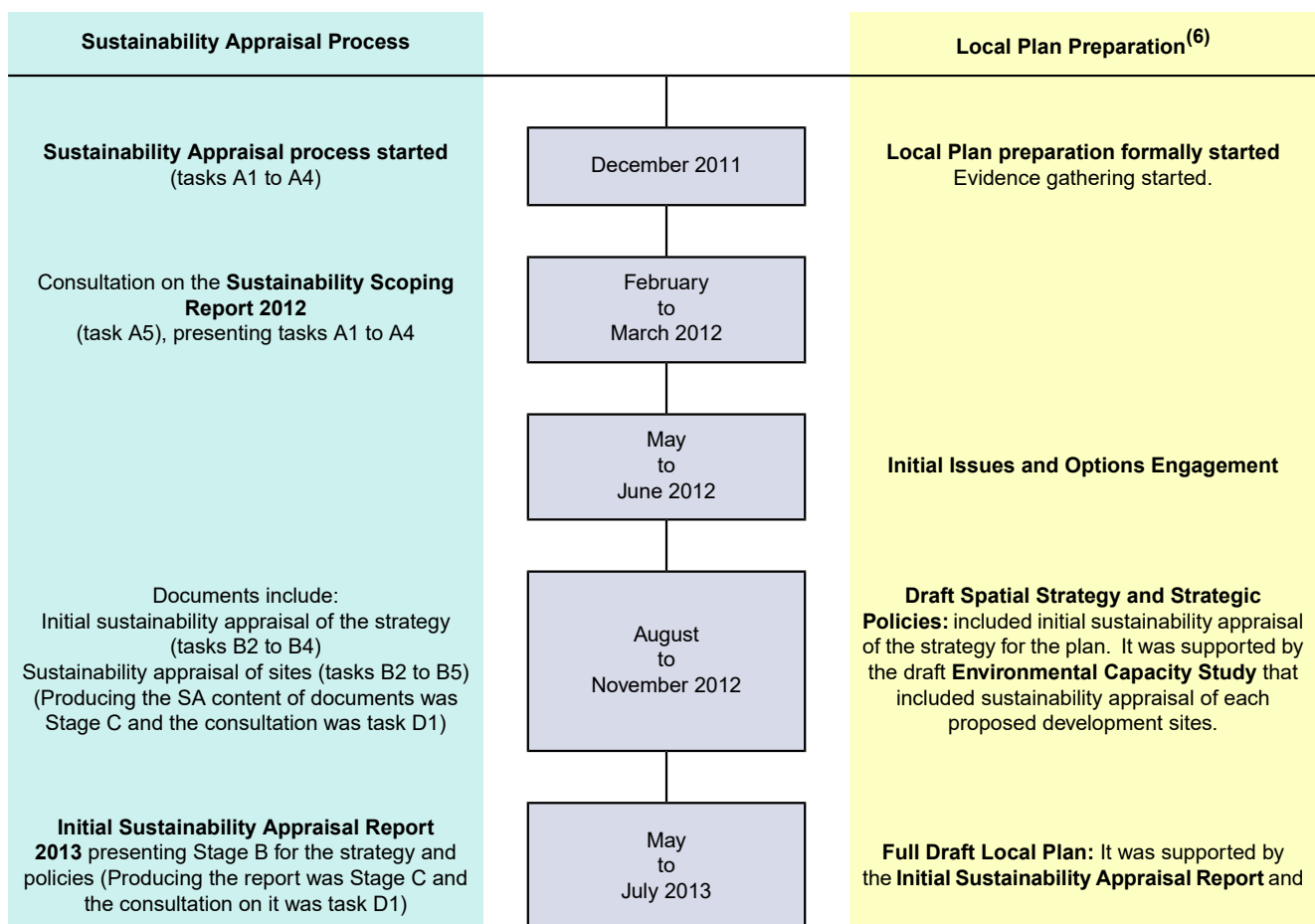
2 How environmental and sustainability considerations have been integrated into the Local Plan

- 2.14** The purpose of the SA Addendum was to present an appraisal of the proposed main modifications. This SA Addendum represents an appraisal of the modified Local Plan policies and text. It should be read in combination with the Final Sustainability Appraisal (CORE/07) that was submitted alongside the Local Plan for examination and the Sustainability Appraisal Explanatory Note (EXAM/03) that was prepared following the hearing session on Matter 1 held on 17th July 2018 to understand the full sustainability impacts of the Local Plan.
- 2.15** The Inspector's final main modifications put forward in his report of 29 April 2019 were unchanged from the proposed main modifications. He confirmed in paragraph 5 that he had considered all of the representations made on the proposed main modifications, the sustainability appraisal and the updated Habitats Regulations report and in paragraph 18 that he had considered the discussions which took place at the examination hearings. The Inspector's conclusion in paragraph 193 was that the SA that had been carried out was adequate.

Local Plan preparation & SA stages

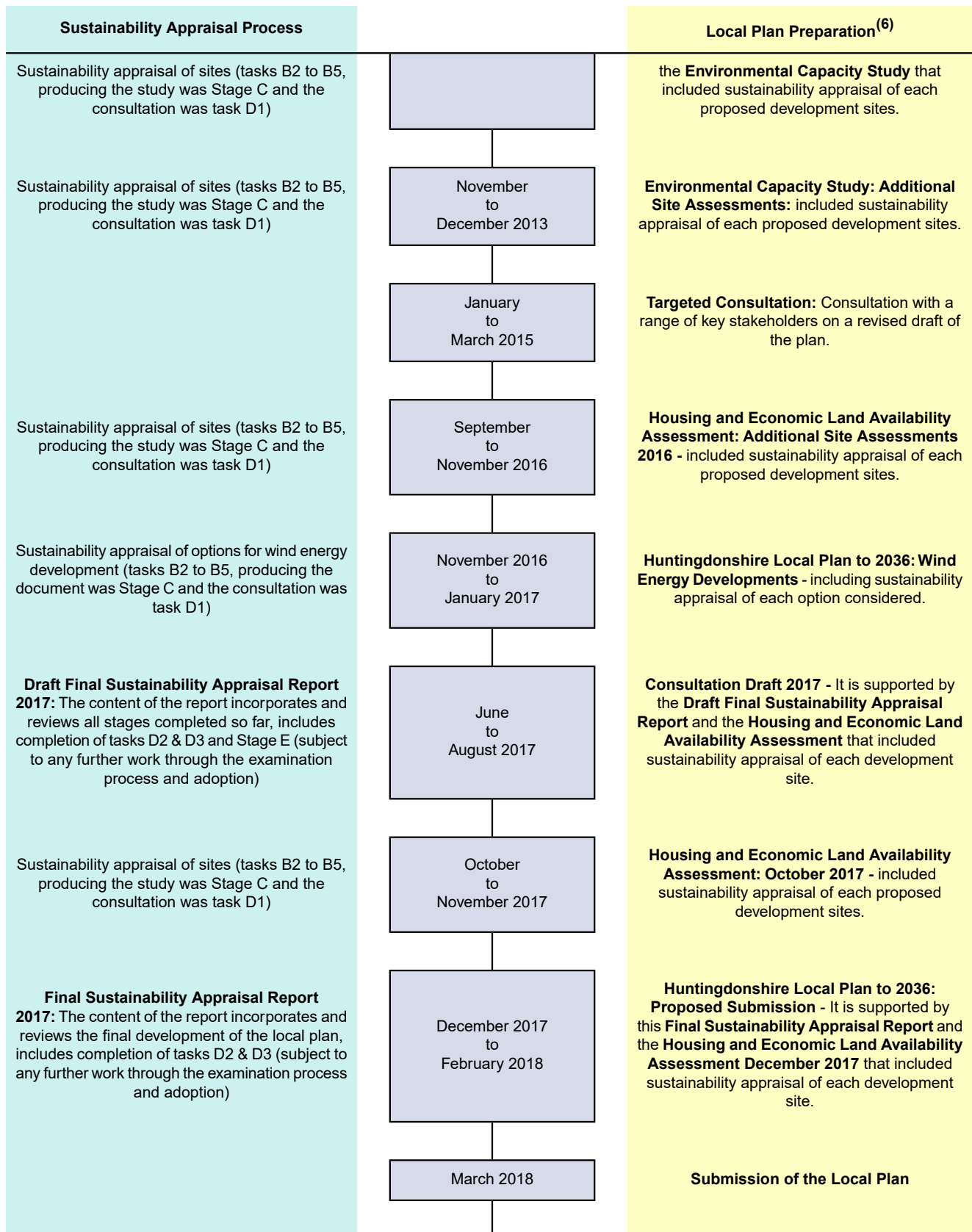
- 2.16** The Sustainability Appraisal: Local Plan Timeline (below) further illustrates how each stage of SA has integrated into the production of the Local Plan. References to tasks (e.g A1, A2, B2) refer to the different stages of SA appraisal discussed above. The outcomes of these processes are explained in more detail in the Final Sustainability Report 2017.

Table 2 Sustainability Appraisal: Local Plan Timeline



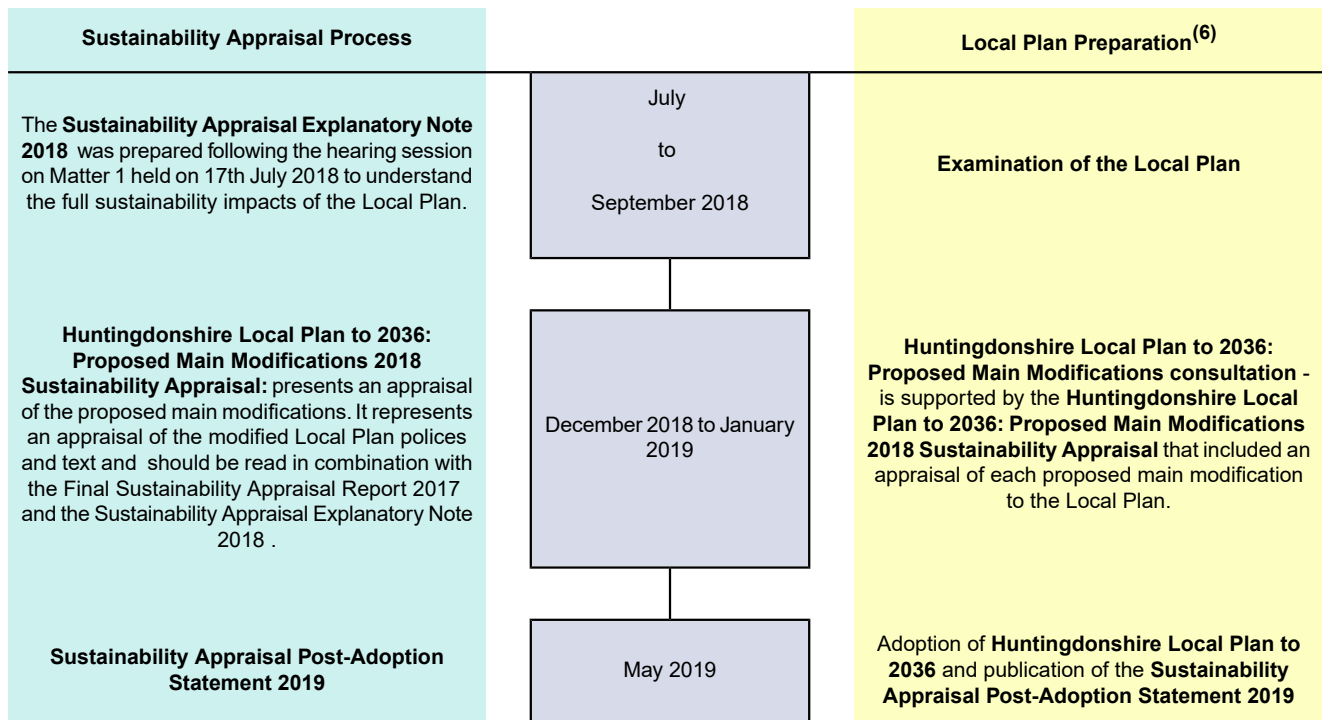
⁶ For full details of local plan preparation stages please refer to the Statement of Consultation

How environmental and sustainability considerations have been integrated into the Local Plan 2



6 For full details of local plan preparation stages please refer to the Statement of Consultation

2 How environmental and sustainability considerations have been integrated into the Local Plan



Habitats Regulations Assessment

- 2.17** In addition to sustainability appraisal of the Local Plan, a Habitats Regulations Assessment (HRA) was also undertaken. This is a requirement of the Conservation of Habitats and Species (Amendment) Regulations 2011. The HRA looked at the impact that the Local Plan is likely to have on European sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites).
- 2.18** Three stages of HRA were undertaken:
- Huntingdonshire’s Local Plan to 2036 - Habitats Regulations Assessment Final Report 2017
 - Huntingdonshire’s Local Plan to 2036 - Habitats Regulations Assessment Addendum to Final Report 2017
 - Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 Habitats Regulations Assessment
- 2.19** The HRA process has not been combined with the SA process. Although there are synergies between the two processes they are distinct as SA is completed throughout the plan production process while HRA is better completed towards the end of the plan production process so that there is certainty about what environmental effects will arise from the plan. It is also considered beneficial if they are conducted separately with HRA being undertaken by an independent body. Although the HRAs were prepared as separate documents to the SA the findings of the HRA reports have still informed the Sustainability Appraisal process where possible especially in relation to biodiversity, water quality and specifically policy LP22: Tourism and Recreation.

⁶ For full details of local plan preparation stages please refer to the Statement of Consultation

3 How the environmental/SA Report has been taken into account

- 3.1 SA is an iterative process which has been undertaken alongside, and informed, preparation of the Local Plan. It aims to show how the Council has appraised the effects of the Local Plan, selecting options that will contribute to achieving sustainable development.
- 3.2 Tasks within each stage of local plan preparation have informed each other and therefore led to updates and changes to conclusions from previous tasks. The SA assessed options, policies, strategies, objectives and site options throughout the plan process and positive and negative effects were identified to reduce the negative effects of the plan and enhance positive ones. The effects of the plan and alternatives were evaluated and consideration was given to the mitigation of adverse effects and maximisation of beneficial effects, this helped to decide which options should be included in the local plan and which should be rejected.
- 3.3 Table 2 Sustainability Appraisal - Local Plan Timeline in Section 2 shows how the preparation of the SA reports corresponded with each stage of the local plan.

Local Plan stages and sustainability appraisal

- 3.4 Table 3 shows how preparation of the SA Reports (which included the Environmental Report requirements) corresponded with each stage of Local Plan preparation, and how any recommendations made in the SA were taken into account.

Table 3 How the SA has been taken into account

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
Evidence gathering	Sustainability Appraisal Process Started	<p>The scoping process stage of the Council's Sustainability Appraisal commenced in December 2011. This allowed the Council to establish the context for sustainability appraisal by assembling evidence needed to inform the appraisal and to establish the assessment framework. This helped to establish the sustainability objectives and decision aiding questions needed for undertaking appraisal of the plan-making process.</p> <p>A wide range of plans, programmes, strategies and initiatives were identified under broad sustainability themes and lower level topics. These topics were checked to ensure they covered the topics required under the SEA directive. For each plan or programme, aims and objectives were assessed for how relevant they were to the Local Plan, and the most important implications for the Local Plan and/ or SA process were collated.</p> <p>Relevant evidence identifying what the district is like now was gathered using the same broad sustainability themes and lower level topics. In addition, for each</p>

3 How the environmental/SA Report has been taken into account

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>broad sustainability theme consideration was given to what would be likely to happen without intervention by the Local Plan.</p> <p>These findings were brought together to identify key sustainability issues and problems, and to suggest how these could be reflected in the Sustainability Appraisal framework. A series of SA objectives and more detailed decision aiding questions were identified in order to appraise the effects of the Local Plan objectives, strategy, policies and allocations.</p> <p>Full details can be found under stages A1 to A4 in the Final Sustainability Appraisal Report 2017</p>
	Sustainability Appraisal Scoping Report 2012	<p>Consultation on the Sustainability Appraisal Scoping Report was held from 24 February to 30 March 2012. The comments received were used to amend the scoping report these can be found in Appendix 2: Summary of Consultation and Amendments of the Scoping Report.</p> <p>The main issues raised were taken into account and changes to the scoping report scoring schemes and decision aiding questions were made. Details can be found in under stage A5 in the Final Sustainability Appraisal Report 2017.</p>
Initial Issues and Options Engagement (21 May to 24 June 2012)	N/A	<p>Consultation on the Initial Issues and Options for the Huntingdonshire Local Plan to 2036 were held between 21 May and 24 June 2012. The public were asked to consider a series of growth options (low, medium and high).</p> <p>No specific sustainability appraisal was published at this stage.</p>
Draft Spatial Strategy and Strategic Policies 2012	Initial Sustainability Appraisal of the Development Strategy 2012	<p>Prior to consultation on the Draft Spatial Strategy and Strategic Policies document (held from 31 August to 23 November 2012) the Council conducted an initial SA of the proposed development strategy and growth options. Details can be found under stages B2-B5 of the Final Sustainability Appraisal Report 2017. The initial three growth options were a low, medium and high economic growth option. A summary and sustainability appraisal of these options are set out in pages 129-140 of the Final Sustainability Appraisal Report 2017. These options were then included in the Draft Spatial Strategy and Strategic Policies document</p>

How the environmental/SA Report has been taken into account 3

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>for consultation with reference to the sustainability appraisal so that comparison could be seen between each option. The sustainability appraisal was included within the Spatial Strategy and Strategic Policies document.</p> <p>The Council used the policies contained in the adopted Core Strategy and the latest version of the Development Management DPD (which reached the Proposed Submission stage in March 2010) as a starting point for drawing up new Local Plan policies. Both of these documents had been through sustainability appraisal processes and public consultation and in the case of the Core Strategy had also been through the examination process and been found sound. These policies were amended in light of the National Planning Policy Framework, which was published in March 2012. Given the history of these policies and the limited range of reasonable alternative options it was considered appropriate to present the policies as part of the Draft Spatial Strategy and Strategic Policies consultation in the form of draft policies as they might appear in the final Local Plan, rather than more descriptive content detailing how a range of options might be set out. The draft policies were not appraised at this point but were presented with a series of questions to prompt consideration of alternative approaches and possible additions or modifications in consultation responses.</p> <p>Following the Draft Spatial Strategy and Strategic policies consultation, the policies were refined taking account of comments received and new available evidence. The policies were then fully reviewed highlighting any SA issues that had not been addressed thoroughly through the draft policies. Further information can be found in pages 164-227 of the Final Sustainability Appraisal Report 2017.</p>
	Environmental Capacity Study 2012	<p>The Environmental Capacity Study evaluated the potential capacity of Huntingdon, St Neots, St Ives and Ramsey and a number of settlements within the District. The purpose of the study was to demonstrate how, where and to what extent development can be undertaken responsibly, without giving rise to irreversible damage to Huntingdonshire's environment. It's aim was to guide the preparation of the Local Plan to 2036 towards a sustainable solution to meet the need for growth in Huntingdonshire.</p>

3 How the environmental/SA Report has been taken into account

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>An assessment of the environmental, economic and social constraints affecting the capacity of broad areas adjacent to the existing built-up areas of each of the larger settlements following the Larger Settlements option from the appraisal of options for the distribution of growth was undertaken. This identified areas with potential capacity for development. Some detailed individual site assessments were also conducted within each area and assessed against the sustainability appraisal objectives providing an indicative deliverable capacity figure.</p> <p>Comments from the consultation were considered and the process was reviewed and refined for the Environmental Capacity Study: Additional site assessments in 2013.</p> <p>Further information can be found in pages 228-259 of the Final Sustainability Appraisal Report 2017.</p>
Full Draft Local Plan 2013	Initial Sustainability Report 2013	<p>The Initial Sustainability Appraisal Report was consulted upon from 31 May to 26 July 2013 alongside the Full Draft Local Plan consultation document. All 23 Spatial Objectives contained in the Draft Local Plan were tested for compatibility against the 21 SA objectives established previously.</p> <p>A draft strategy and a series of draft policies were prepared for the Strategic Options and Policies consultation from 31 August to 23 November 2012. The strategy and draft policies evolved following the consultation led by consultation responses and further evidence as it became available. The Initial Sustainability Report updated the assessment of how the strategy, policies and site allocations had since been developed and refined and assessed alternatives.</p> <p>Updated evidence meant that further SA appraisal was required on updated growth options for the Plan. New sites had been put forward during the Strategic Options and Policies consultation which were appraised and included where they were considered to be suitable as development sites. For those sites that were included in the previous consultation the policies were refined taking account of comments received.</p>

How the environmental/SA Report has been taken into account 3

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
	Environmental Capacity Study 2013	<p>The updated Scoping Report was published as a supporting document to the Draft Local Plan when it was consulted upon between 31 May and 26 July 2013.</p> <p>As with the Environmental Capacity Study 2012 this Environmental Capacity Study looked at each settlement in a holistic manner to consider settlement scale and sustainability issues such as access to services and employment. The study appraised three sites that were referred to as Strategic Expansion Locations, Huntingdon, St Neots, St Ives and Ramsey Spatial Planning Areas and number of settlements within the District.</p> <p>Further information can be found in pages 260-513 of the Final Sustainability Appraisal Report 2017.</p>
Additional Sites Assessments	Environmental Capacity Study: Additional Site Assessments 2013	Additional sites put forward for consideration for development at the Full Draft Plan consultation stage were considered using the same methodology as sites put forward at earlier stages of the local plan's preparation. The assessments of these additional sites were presented in this document. This extra phase of non-statutory consultation was set up to ensure people had the opportunity to comment on any aspect of their assessment without the limitations imposed by the statutory phases of local plan production. Consultation was held from 8 November to 6 December 2013.
Targeted Consultation 2015	N/A	No sustainability appraisal was undertaken at this consultation stage which ran from 23 January 2015 to 20 March 2015.
Additional Sites Assessments	Housing and Economic Land Availability Assessment: Additional Sites Assessments 2016	<p>The Housing and Employment land Availability Assessment: Additional Sites Assessments consultation ran from 26 September to 7 November 2016. This sought opinions on revisions to the methodology and assessments of individual sites submitted between December 2013 and July 2016.</p> <p>The basic objective of this assessment was to establish approximately how many development sites could be available to meet Huntingdonshire's growth needs, what their capacity is, what constraints would need to be overcome to deliver them and when they could be completed. Its purpose was to identify a future supply of land which is suitable, available and achievable for housing and economic development</p>

3 How the environmental/SA Report has been taken into account

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>uses over the plan period and whether it is possible to accommodate the objectively assessed development needs of Huntingdonshire in the Local Plan to 2036.</p> <p>Integration of the Sustainability Appraisal/ Strategic Environmental Assessment (SA) process as a central part of the plan making process is essential when aspiring to maintain and develop mixed and sustainable communities. There was a clear opportunity to integrate SA into plan making through incorporation of sustainability appraisal within this study. The settlement/ Spatial Planning Area approach and the individual site assessments contained within this document were centred on appraisal of sustainability.</p> <p>Further information can be found starting on page 708 of the Final Sustainability Appraisal Report 2017.</p>
<p>Wind Energy Development - option considerations 2016-2017</p>	<p>Huntingdonshire Local Plan to 2036: Wind Energy Developments 2016</p>	<p>The Wind Energy Developments consultation was held from 21 November 2016 to 16 January 2017. The document considered the Council's options for whether and how to identify areas of Huntingdonshire as 'suitable' for wind energy development in the Huntingdonshire Local Plan to 2036. This responded to the approach set out in the 'Written Ministerial Statement', issued on 18 June 2015 by Greg Clark, Secretary of State for Communities and Local Government. It formed a standalone consultation that supported the production of the Proposed Submission Draft Local Plan.</p> <p>A range of possible options were assessed in terms of their compatibility with national planning policy, guidance and evidence and each option was subject to sustainability appraisal within the document. The document informed the production of policy LP 35: Renewable and Low Carbon Energy which guides the potential development of renewable and low carbon energy generating schemes in the district including the locations where development could be considered suitable for wind energy development.</p>
<p>Local Plan Consultation Draft 2017</p>	<p>Draft Final Sustainability Appraisal Report 2017</p>	<p>The draft Final Sustainability Appraisal took into account all previous sustainability appraisal work produced up to this point during the production of the local plan. This included the Sustainability Appraisal Scoping Report, Initial Sustainability Appraisal, Environmental Capacity Study: Additional Site</p>

How the environmental/SA Report has been taken into account 3

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>Assessments, Housing and Economic Land Availability Assessment: Additional Sites Consultation 2016 and the policy outcomes of the Huntingdonshire Local Plan to 2036: Wind Energy Development 2016. All sustainability appraisals of options, strategies, sites and policies included in the draft Local Plan were included within the document. Section D of the document appraised significant changes to the plan objectives, options and preferred options and policies and explained how the SA process and consultation responses had shaped the plan to date. Consultation was held from 3 July to 25 August 2017.</p>
	<p>Housing and Economic Land Availability Assessment June 2017</p>	<p>Previous stages of work on the Huntingdonshire Local Plan to 2036 have included consultation on the Environmental Capacity Study from which this document evolved. The consultation started with the Strategic Options and Policies consultation (Local Plan Stage 2) between August and November 2012 which looked at the overall strategy to be pursued and sought sites for development. This was followed by consultation alongside the first full draft Local Plan (Stage 3) from May to July 2013 where a consultation response form encouraged consistency in the nature of information supplied on additional sites which were promoted at Stage 3. These additional sites were considered and presented in the Environmental Capacity Study: Additional Site Assessments which was consulted upon in November 2013. Another document was published for consultation in September 2016 the 'Housing and Employment land Availability Assessment: Additional Sites Assessment Consultation 2016'. This sought opinions on revisions to the methodology and assessments of individual sites submitted between December 2013 and July 2016 in response to rolling acceptance on potential additional sites for consideration.</p> <p>This latest version was prepared to accompany the Huntingdonshire Local Plan to 2036: Consultation draft 2017. It includes consideration of all appropriate sites put forward up to 31 May 2017.</p> <p>Consultation was held from 3 July to 25 August 2017. A further Call for Sites was also undertaken at this stage.</p>

3 How the environmental/SA Report has been taken into account

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
Site Assessments October 2017	Housing and Economic Land Availability Assessment October 2017	<p>This document formed a supplement to the Housing and Economic Land Assessment published in July for consultation. Its purpose was to review the new sites which were submitted through the 'Call for Sites' undertaken as part of the Local Plan Consultation Draft 2017.</p> <p>This document considered a wide range of potential further development sites which were put forward as being available to meet Huntingdonshire's growth needs, what their capacity was, what constraints would need to be overcome to deliver them and when they could be completed. This was to show whether it was possible to accommodate the objectively assessed development needs of Huntingdonshire as identified in the Local Plan to 2036.</p> <p>The assessment of land availability formed a key part of the evidence being used to prepare the Huntingdonshire Local Plan to 2036. The role of the Housing and Economic Land Availability Assessment was to provide a consistent approach to consideration of sites put forward for development including a formal sustainability appraisal of each site. The potential capacity for growth identified in this assessment was subject to further refinement once development proposals were considered and more detailed site specific evidence was available.</p> <p>By including sites that were potentially suitable for a wide range of development types this assessment provided the opportunity to consider both the potential benefits and impacts of development as a whole on the surrounding area and acknowledged the range of uses that were necessary to maintain viable, mixed and sustainable communities. This approach ensured that all land was assessed together as part of plan preparation to identify which sites were the most suitable and deliverable for a particular use.</p>
Local Plan Proposed Submission 2017	Final Sustainability Report 2017	<p>Consultation on the Local Plan Proposed Submission 2017 was held from 18 December 2017 to 5 February 2018.</p> <p>The draft Final Sustainability Appraisal took into account all previous sustainability appraisal work produced up to this point during the production of the local plan. This included the Sustainability Appraisal Scoping Report, Initial Sustainability Appraisal, Environmental Capacity Study: Additional Site</p>

How the environmental/SA Report has been taken into account 3

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>Assessments, Housing and Economic Land Availability Assessment: Additional Sites Consultation 2016, the policy outcomes of the Huntingdonshire Local Plan to 2036: Wind Energy Development 2016, Draft Final Sustainability Appraisal Report 2017, Housing and Economic Land Availability Assessment June 2017 and the Housing and Economic Land Availability Assessment October 2017. All sustainability appraisals of options, strategies, sites and policies taken forward in the Proposed Submission Local Plan were included within the document. Section D of the document appraised significant changes to the plan objectives, options and preferred options and policies and explained how the SA process and consultation responses had shaped the plan to date. An update including changes to the Plan as a result of the Local Plan Consultation Draft 2017, Call for Sites 2017 and Housing Land Availability Assessment October 2017 were also included in Section D of the document.</p>
	<p>Housing and Economic Land Availability Assessment December 2017</p>	<p>This document brought together the Council's final assessment of sites that could be available to meet Huntingdonshire's growth needs, what their capacity was, what constraints would need to be overcome to deliver them and when they could be completed.</p> <p>The assessment incorporated amendments as a result of all previous stages of sustainability appraisal contained within the Council's previous Environment Capacity Studies and HELAAs to demonstrate the sustainability process applied to determine the allocation of sites within the Local Plan.</p>
<p>Local Plan Examination</p>	<p>Sustainability Appraisal Explanatory Note 2018</p>	<p>This document was not a sustainability appraisal but was prepared following the hearing session on Matter 1 held on 17 July 2018 to assist in the understanding of the full sustainability impacts of the Local Plan. It was developed to signpost the Planning Inspector to the key decisions made via various sustainability appraisal iterations to inform the Local Plan growth strategy, approach to the distribution of growth and consideration of reasonable alternatives.</p>
<p>Local Plan Proposed Main Modifications 2019</p>	<p>Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 Sustainability Appraisal</p>	<p>The purpose of this SA addendum was to present an appraisal of the proposed main modifications to inform Local Plan Proposed Main Modifications consultation. This SA Addendum represented an appraisal of the Local Plan policies and text as proposed to be</p>

3 How the environmental/SA Report has been taken into account

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Local Plan Stage	Sustainability Appraisal	How the Sustainability Report has been taken into account
		<p>modified. It should be read in combination with the Final Sustainability Appraisal (CORE/07) that was submitted alongside the Local Plan for examination and the Sustainability Appraisal Explanatory Note that was prepared following the hearing session on Matter 1 held on 17 July 2018 to understand the full sustainability impacts of the Local Plan.</p>
Local Plan Adoption	Sustainability Appraisal Post-Adoption Statement 2019	<p>The Local Plan was adopted at Full Council on 15 May 2019.</p> <p>This post-adoption statement explains:</p> <ul style="list-style-type: none"> • How environmental (and sustainability) considerations have been integrated into the plan. • How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan. • How the opinions expressed by the public, consultation bodies and (where appropriate) other European Member States during consultation on the plan and the Environmental/SA Report have been taken into account. • The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered. • The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan. <p>No further changes were made after the proposed modifications consultation.</p>

4 How opinions have been taken into account

4.1 This section explains how the comments made by statutory consultation bodies and the public have been taken into account at each stage of Sustainability Appraisal preparation. It includes details of when consultation was held, a brief description of what consultees could comment on, how comments received were taken into account and where the comments and how matters were addressed can be found.

Scoping Report and Initial Issues and Options (2012)

4.2 The Sustainability Appraisal Scoping Report was produced as the first element of the Local Plan preparation. Consultation took place on an initial draft Scoping Report from 24 February to 30 March 2012. The consultation was opened up beyond the statutory consultation bodies of Natural England, Historic England and the Environment Agency to be a full public consultation.

4.3 The Scoping Report consultation provided the opportunity for people to comment on a number of issues including whether the objectives in the Sustainability Appraisal framework were reasonable for assessing the likely significant effects of the Local Plan and whether the review of relevant plans, policies and programmes and baseline information were adequate and appropriate.

4.4 In total 34 comments were made by 11 consultees, including two of the three statutory consultation bodies. The comments were wide ranging but can be summarised as being concerned with:

- (At the time) Recent national developments that have implications for planning, including the National Planning Policy Framework, the Localism Act and the Community Infrastructure Levy
- Plans or programmes that were not referenced
- Public engagement in the Sustainability Appraisal and plan making process
- Links with other aspects of the plan making process, including the Habitats Regulations Assessment
- Economic development, including the Alconbury Enterprise Zone
- Coverage of topics including ancient woodland, heritage assets, flooding, crime and community facilities
- Minor textual changes to aid clarity

4.5 In particular, Natural England sought further consideration of their standards for accessible natural greenspace (ANGST standards); these were only available in draft format when the Scoping Report was prepared but the final version was used during the Initial Sustainability Appraisal (2013). Historic England sought reference to their Heritage at Risk Register which was added to the revised Scoping Report used to shape the Initial Sustainability Appraisal (2013) along with a series of detailed wording amendments to the decision aiding questions used for assessing the significant effects on the Sustainability Objectives.

4.6 In response to the consultation on the draft Scoping Report and as a result of continued work on Stage B tasks a number of changes were made to the Updated Scoping Report that was published alongside the Full Draft Local Plan (2013) consultation documents. The majority of changes made related to the scoring system for the decision aiding questions to be used to inform judgements on Sustainability Appraisal objectives along with introduction of one additional question and changes to three others. A detailed listing of the changes made is presented in the Final Sustainability Appraisal Report (2017) on pages 122-123.

Draft Spatial Strategy and Strategic Policies Consultation (2012)

4.7 At the Draft Spatial Strategy and Strategic Policies Consultation a suite of documents were published for full public consultation from 31 August to 23 November 2012. These included the opportunity to comment on sustainability appraisal of the impact of three potential growth options which was incorporated within the Draft Strategic Options and Policies document. 15 comments were received specifically relating to the sustainability appraisal. English Heritage was the only statutory consultation body to comment directly

4 How opinions have been taken into account

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on this element expressing concern about the impact of high levels of growth on the historic environment and seeking uncertain impacts to be acknowledged until there was greater certainty over the sites delivering the options. Other comments focused mainly on traffic congestion and localised issues.

- 4.8** Potential development sites were published in separate documents by settlement for ease of public access for consultation purposes. Environmental capacity studies accompanied each of these which presented detailed assessments of individual sites including a sustainability appraisal of each site. 484 comments were received on the environmental capacity study documents overall, including many on the sustainability appraisal aspects of the site assessments.
- 4.9** Comments received during this stage of consultation have informed future appraisals. In particular revisions and additions were made to the assessment of impacts against each objective; amendments were made where evidence provided by the representor meant that a change was required based on factual information. The revised sustainability appraisals were then taken forward into preparation of the Draft Local Plan 2013.
- 4.10** Summaries of comments received and responses to them are set out in the Statement of Consultation (2017) (CORE05) on pages 18-36 and 141-237.

Full Draft Local Plan (2013)

- 4.11** Following the 2012 consultation on the Scoping Report an amended Scoping Report was published as a supporting document to accompany consultation on the Initial Sustainability Appraisal Report. A full public consultation took place from 31 May to 26 July 2013 on the first Full Draft Local Plan, the Initial Sustainability Appraisal and the Huntingdonshire Environmental Capacity Study which again incorporated sustainability appraisals of all individual sites put forward for development. The Initial Sustainability Appraisal included appraisals of strategic growth options and policy options.
- 4.12** Only 7 representations were put forward specifically on the Initial Sustainability Appraisal, with a further 6 comments on the draft Local Plan that contained elements specifically relating to aspects of the Sustainability Appraisal. Of the statutory consultation bodies representations were received from English Heritage and Natural England, both of which were supportive of changes made reflecting responses to the Scoping Report consultation. The Environment Agency's comments concerned the Water Cycle Study and compliance with the Water Framework Directive. No-one commented on the overall growth strategy with most reflecting local issues. Responses to the issues raised are presented on pages 575 to 577 of the Final Sustainability Appraisal. A series of amendments were made to the draft Local Plan and Sustainability Appraisal reflecting issues raised.
- 4.13** 31 responses were received specifically on the Environmental Capacity Study although few related to the sustainability appraisals of the sites; the majority of comments were amalgamated with responses to the draft Local Plan itself.
- 4.14** Additional potential development sites promoted through representations on the Draft Local Plan (2013) and accompanying documents were assessed in autumn 2013. An additional consultation document was issued on 8 November 2013. This included revised consideration of the broad areas around settlements as well as assessing each potential site again presenting individual sustainability appraisals.
- 4.15** Reflecting the iterative nature of the Sustainability Appraisal process amendments arising from comments received on the early stages of Local Plan preparation were reflected in the next version of the appraisal methodology. In particular these included:
- Revised appraisals in the Initial SA Report in order to more clearly identify the permanence and longevity of impacts identified as well as the type of impacts; whether they are considered to be secondary, cumulative and/ or synergistic.

How opinions have been taken into account 4

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

- Clarification of the use of a future baseline, what would happen without a local plan, as the basis for appraisal.
- Additional clarification of the consideration of sites in combination.
- Clarification of the consultation methods used and that are intended to be used and the availability of documents during consultation periods. This revision has been made to the Initial SA Report and was taken into account in drawing up the Final SA Report. It has also been made to the Statement of Consultation.
- Addition of key/ clarifying statements in order to more clearly comply with guidance and to aid legibility of the SA process

4.16 Summaries of comments received and responses to them are integrated with those for the Draft Local Plan as many comments received overlapped between the Draft Local Plan, the Initial Sustainability Appraisal and the Environmental Capacity Study documents. They are set out in the Statement of Consultation (2017) on pages 44-59 and 258-351.

Housing and Economic Land Availability Assessment: Additional Sites Consultation (2016)

4.17 A further full public consultation was conducted from 26 September to 7 November 2016 on assessments of additional potential development sites which had been submitted since autumn 2013. This was a re-branded version of the Environmental Capacity Study entitled the Housing and Employment Land Availability Assessment (HELAA). Again this included sustainability appraisals of individual sites, a revised and more detailed methodology was incorporated and in terms of sustainability appraisal the changes included new commentary within each site assessment setting out an analysis of constraints. Comments were sought on all aspects of the document. 108 responses were received during this consultation including detailed comments on a range of sites from all three statutory consultation bodies. Where appropriate amendments were made to appraisals prior to their inclusion in the HELAA 2017 and pages 745-753 of the Final Sustainability Appraisal identify whether changes were considered to be significant.

Wind Energy Developments (2016-2017)

4.18 To inform development of policy LP37 Renewable and Low Carbon Energy a full public consultation was carried out on this single issue from 21 November 2016 to 16 January 2017. This included sustainability appraisal of the four main options presented and a subsidiary option relating to small scale wind turbines. Of the statutory consultees the Environment Agency had no objections or substantive comments. Historic England expressed concern over some policy wording to which amendments were subsequently made although they made no direct comments on the sustainability appraisal aspects of the document. Similarly Natural England sought an amendment to the policy wording which was subsequently incorporated. Twelve comments were received specifically on the sustainability appraisal. Some queried the methodology and weighting attributed to individual elements, others put forward alternative interpretations of the responses to decision aiding questions and sought flexibility within the resultant planning policy to encourage development of wind turbines. Summaries of the comments received and responses to them reflecting changes made are set out in the Statement of Consultation on pages 89 and 412-413.

Local Plan to 2036: Consultation Draft (2017)

4.19 The Consultation Draft Local Plan (2017) was accompanied by a Draft Final Sustainability Appraisal with both being published for full public consultation from 3 July to 25 August 2017. A total of 26 comments on the Draft Final sustainability Appraisal were received from 7 consultees the majority of which were expressions of support with a few from developers seeking updates to the appraisals of particular sites being promoted. Changes were made prior to preparation of the Proposed Submission Local Plan (2017) and its supporting documentation in response to concerns over the iterative nature of the process regarding

4 How opinions have been taken into account

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selection of reasonable alternatives. Summaries of the issues raised and responses to the are set out in the Final Sustainability Appraisal on pages 759-760. Further details on the comments and responses are set out in the Statement of Consultation on pages 91-116 and 417-468.

- 4.20** The Housing and Economic Land Availability Assessment which also accompanied the consultation set out broad settlement level sustainability assessments and assessments of potential development sites. This received a total of 68 comments from 34 consultees. Of the statutory consultees only Historic England made representations seeking precedence be given to consideration of the historic environment in the assessment of broad locations, not just in the individual site assessments. The vast majority of other comments related to the sustainability appraisals of individual sites; amendments were made to reflect factual corrections. As with the Draft Local Plan (2013) comments overlapped between the Consultation Draft Local Plan, the Draft Final Sustainability Appraisal and the Housing and Economic Land Availability Assessment. Summaries of the comments and responses to them are set out together in the Statement of Consultation on pages 91-116 and 417-468.

Housing and Economic Land Availability Assessment (October 2017)

- 4.21** The Housing and Economic Land Availability Assessment (October 2017) was published for full public consultation between 4 October and 3 November 2017 and attracted 704 comments from 239 consultees. The purpose of this document was to consult on assessments, including sustainability appraisals, of sites submitted in response to the the Call for Sites issued in July 2017. The Environment Agency made extensive representations including guidance for future development schemes and identification of betterment opportunities. Natural England also made representations focusing in particular on the new settlement proposals and the need for detailed ecological evaluation before progressing the sites for further consideration; concerns were also expressed over the cumulative recreational impact of developments in the Huntingdon SPA. Historic England provided further advice on the range of historic environment issues that should be addressed in assessments. Comments on the site assessments tended to focus on issues of principle rather than specific sustainability objectives and were dominated by objections to potential development sites. The level of services and facilities in some settlements was challenged and Hilton and Waresley removed as a consequence and Great Paxton inserted. Summaries of the comments received and responses to them are set out in the Statement of Consultation on pages 92-116 and 489-556.
- 4.22** The Final Sustainability Appraisal sets out an appraisal of the significant changes to the strategy for development that were put forward as changes following comments on the Consultation Draft Local Plan (2017) and the Housing and Economic Land Availability Assessment (October 2017). This is on pages 771-781. Appraisal of changes to the policies is set out on pages 783-868 and appraisal of changes made to the proposed site allocations is set out on pages 869-930.

Huntingdonshire Local Plan to 2036: Proposed Submission (2018)

- 4.23** The statutory consultation period for the Proposed Submission Local Plan to 2036 was from 18 December 2017 to 5 February 2018; again this was a full public consultation with the Local Plan to 2036 supported by a wide range of evidence base documents. Natural England expressed concern regarding the inter-relationship between the Sustainability Appraisal and the Habitats Regulations Assessment regarding recreational pressure and provision of mitigation measures. Other comments all related to how specific sites scored against particular sustainability objectives. No further amendments were made to the Final Sustainability Appraisal at this stage. All representations made at this stage were available to the Inspector for his consideration during the examination. The main issues raised are set out in the Statement of Representations March 2018 (CORE04).

Proposed Main Modifications Consultation (2018-2019)

- 4.24** Representations were sought on the Proposed Main Modifications to the Huntingdonshire Local Plan to 2036 along with the supporting Sustainability Appraisal from 10 December 2018 to 29 January 2019. Again this was published as a full public consultation. The proposed Main Modifications Sustainability Appraisal received just 10 representations. Natural England expressed concern over the impacts of reducing the extension to Hinchingsbrooke Country Park and sought assurance appropriate compensation would be made elsewhere. Representations were made that the SA remained inadequate with regard to its consideration of reasonable alternatives and that deficiencies were not resolved by the proposed Main Modifications. Other comments related to appraisals of individual sites. Full copies of all representations made on the Proposed Main Modifications and accompanying Sustainability Appraisal were sent to the Inspector for his consideration as part of the Examination process and are published in the Examination Library as EXAM/48.

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

5.1 This section reflects on each stage of plan production and identifies what alternatives were addressed when the Local Plan, the Sustainability Appraisal and supporting documents were consulted on showing the key sustainability appraisal conclusions for the choices made. Assessments are set out in a range of documents including: the Final Sustainability Appraisal 2017, the Housing and Economic Land Availability Assessment (December 2017), the Wind Energy Developments consultation document 2016, the Sequential Test for Flood Risk, the Strategic Transport Study Development Scenario Comparative Assessment (May 2017), the Strategic Transport Assessment Development Scenario 6 (November 2017) and the Sustainability Appraisal Explanatory Note (July 2018).

Scoping and Initial Issues and Options (2012)

5.2 The first stage of Local Plan preparation involved scoping the issues and initial consultation on broad options. Three growth scenarios were investigated based on forecast housing numbers from 1) Cambridgeshire County Council Research Group 2010 based forecasts, 2) East of England Forecasting Model April 2012 draft baseline forecasts and 3) Office for National Statistics 2008 trend based forecasts. The Scoping Report process was largely factual establishing the baseline situation relating to environmental, economic and social issues and assessing what would happen without any Local Plan.

5.3 The Sustainability Appraisal Scoping Report (2012) concluded that without a Local Plan there would be no strategic consideration of the location of new development which might lead to the following outcomes:

- More of the highest quality agricultural land might be lost to development
- Overall, development might not be steered towards sites of lowest flood risk as the sequential test for flood risk would not be applied to the whole district for individual planning applications
- More development might be located in areas which are not accessible by foot, cycle or public transport to employment, facilities and services. This could lead to increased travel by private car, which in turn would increase emissions from transport, exacerbating climate change and creating air pollution
- The growing older population's need for accessible and adaptable housing or specialist housing provision in the right locations might not be met
- Without a locally developed and evidenced affordable housing policy there is a risk that an increasing number of Huntingdonshire residents would not be able to afford suitable accommodation
- The local need for additional Gypsy and Traveller pitches or plots might not be met.
- More development being located in areas which are not accessible by foot, cycle or public transport to employment, education, facilities and services
- Existing employment sites might not have sufficient protection against competing uses
- Not enough commercial land might be made available of the right type and in the right location to support the district's economic potential
- Either too much, or not enough land for retail might be made available of the right type and in the right location to meet future needs and preferences. This could lead to an increase in the current pattern of a large proportion of residents travelling out of the district for comparison shopping
- Opportunities might be lost to support potential economic growth areas such as farm diversification or the tourist potential of the district's natural assets

Draft Spatial Strategy and Strategic Policies Consultation (2012)

5.4 The Strategy and Policy Consultation (2012) comprised consultation documents on the draft Strategic Options and Policies which included sustainability appraisal of the overall strategy options, a series of documents assessing potential development sites around the district with each site having an individual sustainability appraisal and a set of draft Development Management policies.

Why the adopted Local Plan was chosen in light of reasonable alternatives 5

Developing strategic growth options

- 5.5** As part of the work leading up to the Draft Spatial Strategy and Strategic Policies consultation in 2012 three alternative growth options were identified. These initial growth options were appraised and presented as part of the consultation material. These were considered to be reasonable alternatives to assess at this stage as they reflected a broad spectrum of realistic potential scenarios depending on differing economic recovery rates from the recession.
- 5.6** The Final Sustainability Appraisal 2017 presents the initial three growth options on pages 129-131 and their appraisals on pages 131-140. The Low Economic Growth option was based on the East of England Forecasting Model's 'Lost Decade' scenario which reflected the recent years of recession and assumed another 5 years of sluggish economic growth. This suggested an annual house building target of 655 homes and a total jobs figure by 2036 of 80,000 reflecting a decrease of 1,400 jobs. The Medium Economic Growth option was based on the East of England Forecasting Model's 'Baseline' scenario which reflected the recent recession but contained more optimistic assumptions concerning economic recovery given the dynamic nature of the Cambridgeshire economy. This suggested an annual house building target of 685 homes and a total jobs figure by 2036 of 87,020 reflecting an increase of 5,620 jobs. The High Economic Growth option was based on the East of England Forecasting Model's 'High Migration' scenario which reflected the Office for National Statistics' migration assumptions. This suggested an annual house building target of 810 homes and a total jobs figure by 2036 of 91,800 reflecting an increase of 12,250 jobs.
- 5.7** At this stage the Sustainability Appraisal concluded that the low economic growth option was marginally less sustainable than the medium economic growth option as although it achieved well in terms of environmental factors it would contribute less to economic and social sustainability. The medium economic growth option performed more positively regarding economic and social factors without giving rise to significant environmental concerns and thus was selected as the preferred option at this stage. The high economic growth option achieved well in respect of social and economic issues but had a higher risk of giving rise to environmental concerns which might require mitigation to make this level of development sustainable. Indicative options for delivering these growth options were illustrated based on continuation of existing commitments, use of previously developed land, developments focused within or adjacent to more sustainable settlements and an allowance for small windfall sites across the district.

Developing policy options

- 5.8** The Draft Spatial Strategy and Strategic Policies consultation included a range of draft strategic and development management policies. The strategic policies were informed by the Core Strategy (2009) and the development management policies by the Development Management SPD which reached proposed submission stage in 2010. Both sets of policies were revised in light of the NPPF 2012 and were informed by the Core Strategy Sustainability Appraisal (2008) and the Proposed Submission Development Management Policies DPD Sustainability Appraisal (2010). Given the history of the policies' evolution and the limited range of reasonable alternatives established through previous consultations it was considered appropriate to present them as draft policies during this consultation stage rather than as more descriptive material. Rather than conducting sustainability appraisal at such an early stage a series of questions were posed accompanying each draft policy to prompt consideration of alternative approaches and amendments.

Developing site options

- 5.9** Sites that had previously been identified or promoted for development, including those submitted in response to the Issues and Options consultation, were assessed through a series of Environmental Capacity Studies. These were separated for ease of consultation and used the settlement hierarchy established in the Core Strategy (2009). The assessments built on those in the Strategic Housing Land Availability Assessment documents (2010) and broadened the scope to include sites and settlements that would accord with the preferred growth strategy. Broad settlement level assessments were conducted first to assess the sustainability of each settlement as a whole before considering individual sites. These settlement level assessments considered: flooding and agricultural land issues, nature conservation issues,

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

accessibility, service provision, employment availability and infrastructure. Land was eliminated from further consideration which was wholly in the functional floodplain, agricultural grade 1 or of designated high nature conservation value. A minimum site size threshold was introduced of 0.2ha and 10 dwellings to ensure potential allocations were of sufficient size to contribute to achieving the growth strategy.

- 5.10** All the sites which passed this initial filtering process were assessed in detail for suitability meaning that all alternative site specific development options known and submitted to the Council were appraised at this time. The Environmental Capacity Study documents included sustainability appraisals for each site. Site assessments included consideration of current and surrounding land uses, physical constraints, designations such as flood categorisation and nature conservation followed by consideration of the potential impacts of developing the site and environmental conditions which would be experienced by prospective residents or users. Availability and achievability of the site were assessed through dialogue with site owners and promoters. A wide range of housing, employment and commercial sites were published for consultation at this stage including many employment sites with the benefit of long standing planning permissions. Beyond the initial filters all sites were presented for consultation with descriptive assessments and sustainability appraisals against each objective; no conclusions were drawn in the Environmental Capacity Study documents regarding the suitability for allocation of any site. The sustainability appraisal of the individual sites noted varying levels of sustainability concluding that those in and around the district's towns generally performed better in terms of access to services, employment and transport choices than those in other settlements which informed the choices consulted on as potential development sites.
- 5.11** A call for sites was issued as part of this consultation which attracted just over 100 new site submissions.

Full Draft Local Plan (2013)

- 5.12** The draft Local Plan (2013) presented the first full draft document along with a full Initial Sustainability Appraisal (2013) and a range of supporting documents. It was shaped by new technical evidence regarding alternative growth requirements and by the responses to the consultation in autumn 2012. The consultation took place from 31 May to 26 July 2013.

Strategic options: amount of growth

- 5.13** Detailed analysis of potential housing requirements throughout the Cambridge housing market area was conducted by Cambridgeshire County Council's Research Group on behalf of the Joint Strategic Planning Unit and published as a Technical Paper in May 2013. Originally presented in the initial Sustainability Appraisal the three alternatives which were assessed regarding the potential amount of development comprised:
- No growth option for 15,400 new homes - based on a combination of existing commitments and anticipated natural change only
 - The Technical Paper for 21,000 new homes
 - A Higher Growth option for 25,000 new homes - this assumed a growth rate of 35% taking the average growth rate across the Cambridge housing market area to 2036.
- 5.14** The sustainability appraisal of these alternatives is now presented on pages 142-151 of the Final Sustainability Appraisal (2017). This concluded that the option for 21,000 new homes provided the most sustainable alternative in terms of the amount of growth as it provided adequate growth to meet local needs and support the economy and services whilst not facing as strong deliverability challenges in terms of infrastructure provision and landscape impact as the higher growth option. This 21,000 dwelling figure was taken forward as the most reasonable alternative at this stage.

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Developing growth options

- 5.15** Strategic options for the distribution of growth were originally presented in the initial Sustainability Appraisal and are now replicated on pages 152-163 of the Final Sustainability Appraisal (2017). This took forward the outcomes from the appraisal of the amount of growth assessing the potential distribution of some 21,000 new homes and other supporting uses. During the initial strategic consideration this appraisal was based on varying levels of dispersal of development across the district; these are described on page 152. Three alternative approaches were appraised. The first was a highly concentrated option which required an emphasis on the use of strategic expansion locations to absorb substantial amounts of growth with as much as possible of the remainder concentrated in and around the settlement of the four spatial planning areas based on long standing market towns. The second option again involved use of strategic expansion locations but with a reduced emphasis on the amount of growth directed to them and an enhanced role for the four spatial planning areas and the district's largest villages which offer a range of services and local employment opportunities. The third option considered a dispersed growth pattern with fewer sites and lower density development on any strategic expansion locations and in and around the spatial planning areas; greater emphasis was placed on growth in villages.
- 5.16** At the largest scale emphasis was placed on known opportunities to facilitate delivery of any future strategy. The Core Strategy adopted in 2009 identified land to the east of St Neots as a strategic direction of growth for around 2,500 new homes; this was followed by the St Neots Eastern Expansion Urban Design Framework in 2010 intended to shape the main planning and design factors to be addressed in delivering a sustainable urban extension to St Neots. Given the status of this development and progress made towards its delivery it was assumed in principle to form a sustainable, reasonable alternative for allocation within the Local Plan to 2036.
- 5.17** Over 400ha of land at Alconbury Airfield was identified in the Cambridgeshire and Peterborough Structure Plan (2003) as a strategic employment site. Outline planning permission for warehousing and distribution was granted in December 2003 with a condition giving 10 years for submission of a reserved matters application, approval of appearance, landscaping and layout for proposed rail facilities and a rail link was granted on December 2008 with permission in July 2010 to allow a longer time period for commencement of these works. These commitments established the principle of redevelopment of the site which was sold in November 2009.
- 5.18** The Core Strategy (2009) acknowledged that the employment commitment at Alconbury Airfield was not expected to be implemented. The future potential of both Alconbury Airfield and Wyton Airfield was acknowledged in the Core Strategy (para 5.47) which anticipated at that time that their futures would be considered as part of the next review of the Regional Spatial Strategy. After considerable uncertainty over the future of RAF Wyton the Joint Force Intelligence Unit relocated there in 2013 following discussions on intensification of uses there and release of RAF Brampton which dated back to 2005. Use of the base for training flights ceased shortly after this confirming the availability of much of the airfield adjoining the retained technical base and former military housing forming Wyton-on-the-Hill.
- 5.19** The Sustainability Appraisal identified each of the three alternatives as having some strengths but concluded that the second option involving use of strategic expansion locations but with a reduced emphasis on the amount of growth directed to them and an enhanced role for the four spatial planning areas and the district's largest villages was the most sustainable in the circumstances at the time. It was particularly advantageous when considering the potential to direct high density development to appropriate locations, it was the best option for directing development to areas which are already served by open space or have the capacity to integrate this into the development and provided good opportunities to match population and employment growth. This was the strategy taken forward and consulted upon in the draft Local Plan (2013).

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Developing policy options

- 5.20** Policy options were shaped by the outcomes of the Draft Spatial Strategy and Strategic Policies consultation 2012 and updated evidence where available. The interrelationships between policies and the decision aiding questions for each sustainability objective were established first to provide an overall assessment of policy options. The purpose of this was to establish whether any alternative policy issues had been omitted by identification of sustainability appraisal objectives that were not addressed or whether the scope of proposed policies should be broadened. In the Final Sustainability Appraisal (2017) the interrelationships between the policies in the strategy section and the sustainability appraisals are set out on pages 166-169 and those for the development management policies on pages 197-199.
- 5.21** This was complemented by individual appraisals of each policy or potential development site against a bespoke list of decision aiding questions. The appraisals are set out for the strategy policies on pages 170-196 and for the development management policies on pages 200-227. The conclusions from each policy sustainability appraisal provided recommendations for changes where alternative approaches might be more sustainable. Reflecting the iterative nature of sustainability appraisal any such changes were incorporated into the Draft Local Plan (2013) prior to its publication for consultation.

Developing site options

- 5.22** Site options appraisal was undertaken through a two stage process to identify a potential package of sites capable of delivering the preferred strategic growth option described above. The first stage was assessment of the environmental, economic and social constraints affecting the capacity of broad areas around the major settlements to accommodate additional growth. Originally undertaken through the Environmental Capacity Study (2013) and the Initial Sustainability Appraisal (2013) these are now set out on pages 228-252 of the Final Sustainability Appraisal 2017. Key constraints were identified which were used to filter out sites and locations as not forming reasonable alternatives. These were:
- Land designated as functional floodplain (flood zone 3b)
 - Grade 1 agricultural land
 - Land designated as being a Site of Special Scientific Interest (SSSI) or other important nature designations such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites
 - Land within the 400m safeguarding area of a waste water treatment works in accordance with Policy CS31 of the Cambridgeshire and Peterborough Minerals & Waste Core Strategy 2011
- 5.23** The second stage was detailed assessment and sustainability appraisal of individual potential development sites within the broad areas identified previously as being capable of accommodating additional development along with those within existing built-up areas. A minimum allocation site size threshold of 0.2ha and 10 dwellings was set in accordance with the national definition of major development. These are set out on pages 253-513 of the Final Sustainability Appraisal (2017). Alternative and additional sites put forward during the 2012 Draft Spatial Strategy and Strategic Policies consultation were assessed and considered for inclusion as allocations to help contribute towards meeting the preferred growth strategy for the draft Local Plan 2013. For all developments significant account was taken of flood risk, accessibility, opportunities for redevelopment of previously developed land, environmental impact and deliverability. Detailed sustainability appraisals were undertaken of a wide range of sites of a variety of sizes.
- 5.24** The Sustainability Appraisal assessment concluded which sites would be suitable for development dependent on which growth strategy option was to be taken forward in the final Local Plan. The findings of the Sustainability Appraisal were supplemented with other relevant factors including availability and deliverability and other evidence base documents when deciding which sites to select for proposed allocation.

Environmental Capacity Study: Additional Sites Assessments 2013

5.25 The 2013 draft Local Plan consultation was accompanied by a 'Site submission' form seeking additional potential development sites for further consideration as alternatives to help deliver the growth strategy that would ultimately be incorporated into the Local Plan to 2036. The sites submitted at this stage were assessed and individual site sustainability appraisals undertaken in autumn 2013 and then published for consultation in the Environmental Capacity Study: Additional Sites Assessment 2013. Responses were then amalgamated with those from the previous consultation so that options could be selected from the enhanced pool of potential development sites. The outcomes of these are detailed below.

Spatial planning areas

5.26 A total of 15 additional sites were taken through in the Spatial Planning Areas for detailed assessment. Of these 3 were substantial sites capable of accommodating in excess of 1,000 dwellings each which had potential to make substantial contributions to alternative options to deliver the development strategy. All the sites were located to the north or north-west of Huntingdon. Sapley Park Farm was considered to be a reasonable alternative and assessed further but ultimately proved to be undeliverable as an option due to highway constraints. The land north-west of Alconbury Airfield was not considered to be a reasonable alternative given its detachment from Huntingdon at least until development at Alconbury Weald is substantially complete. Land north-east of Alconbury Airfield was considered to be suitable for development but was then developed as a solar farm with a 25 year lifespan eliminating its availability.

Key service centres

5.27 Only one site, to the west of Warboys was put forward elsewhere in the district which was of a scale capable of accommodating in excess of 1,000 dwellings with potential to make a substantial contribution to an alternative option to deliver the development strategy. However, it conflicted with the broad area assessment of capacity and was of such a scale as to overwhelm the existing settlement so was not progressed through a detailed sustainability appraisal. Others were below the 0.2ha minimum threshold determined for allocations or were eliminated due to the broad areas assessments. A number of sites were also submitted in small settlements but none presented adequate justification to support an alternative strategy of promoting allocations within these.

Housing and Economic Land Availability Assessment: Additional Sites Consultation (2016)

5.28 A further stand-alone consultation was carried out in September to November 2016 on additional sites which had been put forward for consideration since the HELAA additional sites consultation of 2013. This Housing and Economic Land Availability Assessment: Additional Sites Consultation (2016) included a revised methodology principally to take account of the NPPG including revised guidance on calculation of residential capacity and new commentary setting out a constraints analysis for each site. Sustainability appraisals were included of the additional sites put forward. Two sites were put forward capable of accommodating in excess of 1,000 dwellings: RAF Alconbury to the north-west of Huntingdon and Gifford's Park to the east of St Ives. Both were considered potentially suitable for development in sustainability terms and hence were included in the appraisals when preparing the final package of proposed site allocations. Detailed assessments of eight smaller sites were also completed. The appraisals are presented on pages 708-742 of the Final Sustainability Appraisal (2017).

Wind Energy Developments (2016-2017)

5.29 A subject specific consultation was undertaken in late 2016 in response to the Written Ministerial Statement (WMS) of 18 June 2015, entitled Huntingdonshire's Local Plan to 2036: Wind Energy Development. It addressed how planning proposals for wind turbine developments should be handled. The WMS set new

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parameters within which wind turbine proposals could be permitted which necessitated consideration of identification of a suitable area within the Local Plan. The consultation document identified a range of alternative approaches and incorporated sustainability appraisal of each. The options assessed were:

1. The whole district is identified as suitable
2. The Great Fen and its landscape and visual setting are not suitable
3. Landscape character areas above prominent/ conspicuous thresholds are not suitable
4. The whole district is not suitable
5. Additional option A - small turbines (up to 25m) are suitable which could be combined with any option 2-4

5.30 The Sustainability Appraisal set out within Huntingdonshire's Local Plan to 2036: Wind Energy Development (2016) consultation document concluded that option 2 was most sustainable alone and option 3 when combined with the additional option A. The assessment concluded that there was very little difference between them in sustainability terms. In summary option 2 was marginally better for strategic or global level sustainability and options 3 and A marginally better for local sustainability. Ultimately option 2 was put forward in the Consultation Draft Local Plan 2017.

Local Plan to 2036: Consultation Draft (2017)

5.31 Sustainability Appraisal is an iterative process and preparation of the 2017 Consultation Draft Local Plan to 2036 is presented on pages 579-707 of the Final Sustainability Appraisal 2017. Where sites were added as a significant change these are reported through the HELAA 2016 consultation. This stage was undertaken as an appraisal of the significant changes (Stage D2 of the Final Sustainability Appraisal). Revisions were made to the appraisals to more clearly identify the permanence and longevity of impacts identified as well as their type, clarification was included of what would happen without a local plan to provide a clearer baseline for the appraisals and additional clarification was made of the consideration of sites in combination.

Growth options

5.32 Updated testing of the objectively assessed need for both market and affordable housing was completed in April 2017 reflecting updated guidance in the NPPG and updated national forecasts and projections of population and household numbers. This produced revised figures establishing the need for 20,100 dwellings of which 7,897 should be affordable, associated with a requirement for 14,400 additional jobs. This was based on a consistent methodology with other updates carried out within the Cambridge housing market area so was considered to be the most reasonable approach at this stage of Local Plan preparation given the evidence base available. Details of the consideration of the updated growth target are set out on pages 589-590 of the Final Sustainability Appraisal 2017. Taken with the policies that sought to deliver housing over and above this figure it was not appraised as a significant change to the Local Plan.

Development strategy

5.33 The revised development strategy is appraised on pages 592-602 of the Final Sustainability Appraisal (2017) and is a much closer reflection of the Local Plan as adopted. The appraisal recognised that the approach had been changed to provide greater clarity of the broad strategic principles reflecting the plan's objectives and that the number of strategic expansion locations was amended from three to two as the Strategic Transport Study (2017) revealed that Wyton Airfield was undeliverable at present due to highway constraints. The conclusion to the appraisal of the development strategy judged that the policy continued to identify strategic expansion locations and development sites in service centres and towns which provide greatest opportunities for co-location of homes, jobs and services and minimises the wider impact. This approach has continued through to the adopted Local Plan.

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- 5.34** No other suitable, available and achievable locations had been put forward at this point as potential alternative strategic expansion locations for allocations within the Local Plan. Although a proposal for a garden village at Sibson had been submitted to MHCLG in July 2016 the 'Prospectus Question' answers which formed part of this submission clearly specified (on page 4) that the proposal was at an early stage and was envisaged to be in addition to the Local Plan proposals, hence its deliverability was open to question and it was not considered as a reasonable alternative at this stage for the development strategy.
- 5.35** Flood risk and waste water management were originally a single policy but were revised at this stage to two separate policies as carried through into the adopted Local Plan; this approach was considered more reasonable in the light of consultation responses and the introduction of county-wide guidance on flood risk assessments and managing flood water. A new policy 'The Countryside' was also included as it was considered reasonable to provide specific advice on appropriate development in this location.

Development management policies

- 5.36** A table set out on pages 593-595 of the Final Sustainability Appraisal 2017 identifies the evolution of policies between the Draft Local Plan consultation in 2013 and the Consultation Draft Local Plan of 2017. This shows the new policies incorporated in response to consultation and evolving national guidance. Detailed appraisals of the revised policies at this stage are set out in the Final Sustainability Appraisal 2017 pages 630-705.
- 5.37** New policies on 'Design Context', 'Strategic Placemaking' and 'Surface Water' were incorporated in response to previous consultation responses and evolving national guidance. Alternative approaches, including the benefits of having or not having such policies, were considered during their preparation and the preferred option published for consultation following sustainability appraisal. Alternative approaches regarding 'Surface Water' were restricted by advice from the Lead Local Flood Authority and compliance with the Cambridgeshire Flood and Water SPD; the policy as adopted has been changed a little from this original to incorporate more specific guidance on drainage systems and SuDS.
- 5.38** The 'Established Employment Areas' policy was amended to reflect updated national guidance which limited the alternative approaches that could be pursued but provided additional flexibility over uses. An alternative approach was brought in for the 'Rural Economy' policy than that consulted on previously allowing significantly more scope for supporting rural businesses rather than limiting such growth to locations within existing settlements.
- 5.39** The 'Affordable Housing Provision' policy was subject to extensive viability testing of alternative percentage requirements for inclusion of affordable homes within major development sites. Implications of both higher and lower percentage targets on both overall housing delivery and affordable housing delivery were assessed. The adopted Local Plan policy sets a 40% target which was judged to be the most appropriate balance between being aspirational and being reasonable. The 'Housing Mix' policy was reassessed in response to the introduction of optional standards on accessibility rather than use of the Lifetime Homes standards. Varying proportions of M4(2) and M4(3) standard dwellings were considered relating to the information available and viability tested to check deliverability across differing house types and value areas. The adopted Local Plan 'Housing Mix' policy provides support for schemes which provide 100% of new dwellings at M4(2) standards and a proportion at M4(3) subject to viability. A new 'Specialist Housing' policy was introduced to support provision of self-contained specialist housing and residential institutions which has been carried through to the adopted Local Plan. The addition of this specific guidance was considered to be a more reasonable alternative in response to issues raised in consultation and updated evidence regarding the ageing population of Huntingdonshire.
- 5.40** More specific guidance on appropriate locations for sites for Gypsies, Travellers and Travelling Showpeople was added; alternative distances were considered in preparation of this policy with those ultimately included being considered the most appropriate balance between facilitating sufficient choice of locations, access to services and facilities and protecting the open countryside. 'Rural Exceptions Housing' was consulted upon as a substantially revised version of the previous Enabled Exceptions draft policy. This proposed a

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requirement of at least 60% of the net site area for affordable housing and the remainder for market housing. A range of alternatives were considered in preparation of this informed by policies found sound elsewhere and the viability of proposed exceptions sites in the district. Given the limited number of sites being delivered the option put forward aspired to provide sufficient incentive to landowners to bring additional sites forward in response to the level of affordable housing need in the district. A new 'Health Impact Assessment' policy was included for which alternatives were considered regarding whether to have the policy or not and what scale of development it should be applied to concluding that the varied approach depending on the scale of development taken through into the adopted Local Plan provided a reasonable balance between securing healthy, inclusive communities and not over-burdening developers.

- 5.41** A 'Heritage Strategy' policy was introduced in response to national guidance and consultation responses; alternatives considered included identifying specific heritage assets but the policy was simplified to focus on providing clear guidance on key assets. This was not carried through as a policy into the adopted Local Plan as the alternative approach of separating the Heritage Strategy from the Local Plan policy was considered to be more reasonable as Huntingdonshire does not have a free-standing Heritage Strategy. 'Renewable and Low Carbon Energy' was substantially amended shaped by the alternatives set out in the targeted consultation detailed previously and its consultation outcomes. 'Air Quality' was also a newly introduced policy at this stage; alternatives were limited given the scope of influence planning has on this and the anticipated alterations to AQMAs in Huntingdonshire following completion of the rerouted A14. 'Ground Contamination and Groundwater Pollution' was also a new policy in reply to consultation responses; this was strongly shaped by Environment Agency advice and is maintained in the adopted Local Plan in a very similar format. 'Water Related Development' was a substantially extended version of the draft policy addressing residential moorings; this was prepared in reply to issues raised during consultation and provided more comprehensive guidance on water related development than previous separate alternatives and has been taken through into the adopted Local Plan with very little alteration.

Site selection

- 5.42** Site selection at this stage was shaped by responses to the previous consultation draft plan, the various iterations of the Environmental Capacity Study/ Housing Land Availability Assessment, removal of residential sites for under 200 dwellings which had already commenced, recently granted planning permissions for major sites, outcomes of the Strategic Transport Study and outcomes of the Sequential Testing for Flood Risk.
- 5.43** The Strategic Transport Study played a major role in shaping choices of both individual sites and alternative packages of sites for allocation due to the need to demonstrate the deliverability of the Local Plan. The modelling approach used for the Strategic Transport Study was based on highway assignment model runs of the Cambridge Sub-Region Model 2 (2016) (CSRM2). Although this model does not cover the whole of Huntingdonshire it was the best tool available and covers the part of the district which includes Huntingdon, St Neots and St Ives where the majority of existing development is concentrated.
- 5.44** Due to high demand for usage of the CSRM2 and resource limitations a finite number of runs could be undertaken. Four development scenarios were initially selected for modelling. A baseline was allowed of 3,553 C3 dwellings and 504 C2 beds either completed since the base date of the local plan, under construction as at 31/03/2015 or on permitted sites not included in any of the proposed development scenarios. The four development scenarios involved overall growth targets of:

Table 4 Initial development scenarios for the Strategic Transport Study 2017

Use	Scenario 1	Scenario 2	Scenario 3	Scenario 4
C3 dwellings	25,414	23,794	23,134	31,974
C2 beds	604	564	604	704

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Use	Scenario 1	Scenario 2	Scenario 3	Scenario 4
A class uses (m ²)	36,530	36,530	33,030	41,530
B class uses (m ²)	472,265	458,265	465,265	489,765

5.45 A series of potential mitigation measures was also tested to establish what could be implemented to support delivery of the potential development site scenarios. These included:

- A series of junction improvement schemes to alleviate specific impacts of sites within the development scenarios
- Substantial increases to the highway capacity in the A141 corridor north of Huntingdon
- Creation of a third crossing over the River Great Ouse to the east of Huntingdon
- Closure of the historic town bridge carrying the B1044 between Huntingdon and Godmanchester to encourage traffic to use the new junction onto Mill Common being created through the A14 improvement scheme

5.46 Five packages of mitigation measures were produced providing a variety of combinations of the potential schemes and tested for each development scenario:

- Mitigation package 1 - all junction improvements only (estimated cost £6.7m)
- Mitigation package 2 - all junction improvements and A141 improvements (estimated cost £87.3m)
- Mitigation package 3 - All junction improvements and A141 improvements and third river crossing (estimated cost £223.5m)
- Mitigation package 4 - all junction improvements and third river crossing (estimated cost £142.9m)
- Mitigation package 5 - all junction improvements and third river crossing and town bridge closure (estimated cost £143.0m)

5.47 Only mitigation package 1 would be deliverable through developer contributions alone but it does not provide a satisfactory level of impact mitigation for any of the development scenarios. Mitigation package 3 provided the best results for all scenarios but requires a level of investment beyond the scope of deliverability through developer contributions. Of the packages which involve either the new A141 scheme (package 2) or the third river crossing (packages 4 and 5) the new A141 scheme generally delivers greater improvements. The Strategic Transport Study confirmed that any mitigation package which would adequately resolve the impacts of any of the development scenarios on the highway network was incapable of being provided by developer contributions alone and would require significant external funding. Therefore the analysis concluded that none of the development scenarios were deliverable in terms of the level of infrastructure spend required to mitigate their impacts.

5.48 A further scenario (5) was then tested which included 21,094 C3 dwellings, 504 C2 beds 31,530 m² of A class uses and 437,265 m² of B class uses. The rationale for this was informed by detailed consideration of the analysis of the previous four scenarios. It resulted in a scenario which contained a lower overall level of development while still meeting the objectively assessed need for housing. It aimed to generate fewer trips on the network to minimise additional pressures and concentrated significant growth along the Ermine Street corridor to the north-west of Huntingdon in close proximity to the A14 to avoid separation by the river from the trunk road network to minimise the need for significant infrastructure improvements. This was considered to form a reasonable alternative to the packages tested previously. The majority of the modelling was undertaken in late 2016/ early 2017; none of the packages of sites assessed at that time included the proposed Sibson Garden Village as a reasonable alternative as at that time the proposal was expected to be brought forward outside the Local Plan through the first round of expressions of interest under the Garden Villages programme. The decision letter in January 2017 did not support the scheme, and in practical terms the CSRM2 does not extend that far north in the district.

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- 5.49** The conclusion to the Strategic Transport Study (INF/09, pages 85-87) established that Scenario 5 could be delivered with just a package of junction mitigation measures costing in the region of £5m supported by interventions to support walking, cycling and public transport. Thus, this was incorporated as the preferred option in the Consultation Draft Local Plan 2017 as the only option which had been demonstrated to be deliverable. The package of sites in this is very close to that in the adopted Local Plan.
- 5.50** Huntingdonshire experiences significant flood risk necessitating completion of a Strategic Flood Risk Assessment (FLO/02) and Appendices (FLO/03-10) and Sequential Test for Flood Risk (FLO/01) to inform the suitability of potential development sites. Site selection commenced with those wholly in flood zone 1 but ascertaining whether a site is sequentially suitable for allocation for development is complicated by the number of sites which do not lie wholly within a single flood zone. Thus where more than 75% of a site lies within flood zone 1 it was assumed that the proposed development could be sequentially accommodated within that 75% with the remainder for open space or similar uses flood risk is not a significant constraint. This was considered to be a pragmatic response given the historic development of the district's towns which are all either in the Ouse Valley or in the Fens.
- 5.51** The Sequential Test for Flood Risk was applied on an individual site basis and included assessment of a range of sites including reasonable alternatives which were then discounted for non-flooding reasons arising from their individual sustainability appraisals or the conclusions of the Strategic Transport Study (2017). The flood risk vulnerability of different types of development was also taken into consideration using the vulnerability classification from the Planning Practice Guidance. Once sufficient land to meet housing, employment and retail requirements was identified further assessment was undertaken of potential additional sites which could increase flexibility of supply and offer strong sustainability or regeneration benefits. These are set out in Appendix 1 of the Sequential Test for Flood Risk on pages 19-28. A limited number of these were proposed for allocation over and above the objectively assessed need.
- 5.52** It is acknowledged that Huntingdon Racecourse lies predominantly within the functional floodplain however as development is proposed for enhancement of existing facilities there are no reasonable alternatives to this so any development proposal will need to be supported by an appropriate site specific flood risk assessment. Similarly the proposed extension to Hinchingsbrooke Country Park could not reasonably be located elsewhere but as the proposed use for amenity open space is categorised as water compatible this was not considered to impede the proposed allocation.
- 5.53** The package of proposed site allocations put forward in the Consultation Draft Local Plan 2017 was informed by a combination of all evidence base material available at the time and was considered to form the most appropriate package in terms of deliverability whilst according with the preferred development strategy.

Housing and Economic Land Availability Assessment (October 2017)

- 5.54** As part of the consultation and engagement opportunities put forward in the summer of 2017 a formal call for sites was published to identify any additional potential development site allocations including sites in small settlements benefiting from a reasonable level of services and facilities. Over 200 sites were submitted. Assessments were undertaken, including sustainability appraisal, and published for consultation in October 2017.
- 5.55** Five very extensive areas of land were put forward providing opportunities for the creation of new settlements. Their sustainability appraisals are set out in the HELAA December 2017 on pages 9-29. The smallest sites were two parcels of land at Abbotsley Golf Course (47 ha) and contiguous with this Abbotsley Squash Club and Cromwell Golf Course (47 ha); in combination the sites have an estimated capacity for a small new settlement of approximately 1,640 new homes supported by 11 ha of employment land and supporting uses. The site was not considered to be a reasonable alternative at this stage of preparation of the Local Plan as there was no supporting evidence to demonstrate its deliverability.

Why the adopted Local Plan was chosen in light of reasonable alternatives 5

- 5.56** Sibson Aerodrome was the next largest site comprising 126 ha put forward for 2,500 new homes with 1.5 ha of employment and supporting uses. Considerable supporting studies were submitted building on the site's earlier submission to the Garden Villages Programme. The site was not considered to be a reasonable alternative at this stage of preparation of the Local Plan as there was insufficient evidence on the viability and achievability of the infrastructure required to support the development, particularly the proposed new junction directly onto the A1 needed to provide access to the site.
- 5.57** RAF Molesworth was the next largest site put forward at 263 ha with an estimated capacity for approximately 4,600 new homes, 23 ha of employment land and supporting uses. In September 2017 its anticipated release was put back to 2024 at the earliest. The site was put forward as a 'red line' submission only with no supporting evidence with the agent stating that allocation was not sought at this time with the purpose of the submission being to seek acknowledgement of the site's future potential. It was not considered to be a reasonable alternative as the site was acknowledged not to be deliverable within the foreseeable future.
- 5.58** The largest site put forward comprised 524 ha of land west of the A1 from Buckden to Brampton with an estimated capacity for 9,200 new homes, 69 ha of employment land and supporting uses. Again this was put forward as a 'red line' submission only with no supporting evidence and although the availability of the land was confirmed there was no indication of when it might be achieved. This site was not considered to be a reasonable alternative at this stage of preparation of the Local Plan as there was no evidence regarding its deliverability.
- 5.59** As none of the alternative sites put forward were considered to be deliverable they were not included in the Proposed Submission Local Plan 2018 and are not included in the adopted Local Plan. No further information was received on sites previously considered, including Wyton Airfield and Gifford's Park, to change their previous evaluations as being undeliverable within the period for this Local Plan.
- 5.60** Sustainability appraisals of other sites submitted demonstrated a number of them that were potentially suitable for development and went on to be proposed as allocations in the Proposed Submission Local Plan 2018. In terms of newly submitted sites large enough to impact on the development strategy two sites to the south/ south east of the A428 were not considered to be reasonable alternatives due to separation from the existing built up area of St Neots and the agent for both acknowledged commencement of delivery would be beyond the next 10 years. Over half of the site put forward to the east of Brook Road in St Neots lies in flood zones 2 and 3 and forms a fundamental part of the open space setting to the Great Ouse corridor through St Neots making development inappropriate. 74 ha of land to the north of St Ives which was not considered to be suitable for development and a large portion was then established not to be deliverable as the proposal conflicted with the landowner's aspirations for that area. 122 ha of land comprising the countryside between St Ives and Wyton-on-the-Hill was assessed as being unsuitable due to visual intrusion and resulting coalescence. None of the extensive sites put forward were considered to be more sustainable than those already proposed in the Consultation Draft Local Plan 2017; reflecting this conclusion none have been brought forward into the adopted Local Plan.
- 5.61** A large number of sites were put forward in key service centres and small settlements. Two new sections were added to the HELAA in the December 2017 version considering potential development sites in small settlements categorised as having 'good sustainability' (on pages 734-809) and 'reasonable sustainability' (on pages 810-983). These led to consideration of an alternative approach to the development strategy as assessment of these, including sustainability appraisals, indicated that some had potential to contribute to the development needs of the district. This led to the inclusion of a new category of 'Local Service Centres' in the Proposed Submission Local Plan; however, they were not ultimately taken through for inclusion in the adopted Local Plan following the Proposed Main Modifications.

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

Huntingdonshire Local Plan to 2036: Proposed Submission (2018)

- 5.62** The Proposed Submission Local Plan was developed from the consultation responses gathered on the Consultation Draft 2017, the HELAA October 2017 and the Draft Final Sustainability Appraisal (2017). The approach taken and appraisal of the significant changes made is presented in the Final Sustainability Appraisal (2017) on pages 756-930.

Development strategy

- 5.63** A new policy formally setting out the target for the amount of housing and employment development was introduced to provide clarity and has been continued into the adopted Local Plan. The other significant change to the Development Strategy at this stage was inclusion of an additional tier in the settlement hierarchy for 'Local Service Centres' to allow for six additional allocations and slightly more flexibility for future development than in 'Small Settlements'.
- 5.64** Representations on the Consultation Draft 2017 identified significant concerns around over-reliance on delivery of strategic expansion locations. Three main options were considered at this stage: addition of a new settlement, addition of allocations in a limited range of small settlements or addition of allocations in a wide range of small settlements. The lack of suitability/ deliverability of any of the new settlement proposals submitted in 2017 meant that the first option was undeliverable and so not considered to be a reasonable alternative. The second option was incorporated into the proposed Submission Local Plan's development strategy with two strategic expansion locations and introduction of a Local Service Centres policy covering Alconbury, Bluntisham and Great Staughton. The third option was rejected as it was considered to represent the dispersed option appraised as less sustainable early in the local plan preparation. The options are summarised in the Sustainability Appraisal Explanatory Note (2018) on pages 7-8.
- 5.65** The Final Sustainability Appraisal (2017) pages 770-781 appraises the changes to the distribution of growth. This concluded that the approach had the same benefits as previously but broadening the range of locations where development is planned could also benefit inward investment, affordable housing provision and provide opportunities for down-sizing within a community. Further explanation of this process is set out in the Sustainability Appraisal Explanatory Note (2018) (EXAM/03) on pages 6-8 and Appendix 2.

Development management policies

- 5.66** Limited changes were made to development management policies at this stage; sustainability appraisals of significant changes are set out in the Final Sustainability Appraisal (2017) on pages 814-868. Of most significance was the increased flexibility introduced into the 'Rural Economy' and 'Rural Buildings' policies which was considered more reasonable than retaining the previous approach as this responded to the increased emphasis in the White Paper: Fixing our broken housing market on supporting thriving rural communities. These changes have been carried through into the adopted Local Plan. Amendments to the 'Biodiversity and Geodiversity' policy improved the opportunities for protecting water resources which was deemed preferable. Identification of an area potentially suitable for wind energy developments in the 'Renewable and Low Carbon Energy' policy was considered most appropriate both in terms of providing certainty and in accordance with earlier consultation responses. This saw inclusion of the preferred approach identified from the Wind Energy Developments consultation and consulted on through the Consultation Draft Local Plan 2017 and has been carried through into the adopted Local Plan.

Site allocations

- 5.67** As set out in the development strategy above a new Local Service Centres category was introduced in the Proposed Submission Local Plan (2017). To distinguish these from the large number of small settlements five sites were taken forward for proposed allocation in the new Local Service Centres category.

Why the adopted Local Plan was chosen in light of reasonable alternatives 5

- 5.68** Sustainability appraisal of the sites added to the Proposed Submission Local Plan were incorporated into the Final Sustainability Appraisal (2017) on pages 869-930 as presented in the HELAAs of July and October 2017. These represent the preferred sites for the Proposed Submission Local Plan. The full HELAA (December 2017) sets out appraisals of all sites considered including those not ultimately put forward as proposed allocations due to a range of sustainability or deliverability issues.
- 5.69** An Addendum was prepared to the Strategic Transport Study (INF/11) to test the deliverability of potential additional sites which were selected from those with good sustainability appraisals, low flood risk and that collectively provided a spread of sites across the district in accordance with the development strategy. This is referred to as Development Scenario 6. Intensification to the level of development at Alconbury Airfield by an additional 1,500 homes was incorporated taking it to a total of 6,500 homes, still below the possible 7,200 homes consulted on in the Spatial Strategy and Strategic Policies Consultation (2012). The adopted Local Plan allocation for Alconbury Airfield retains the core allocation for 5,000 dwellings and the reference to the potential for more homes to be supported subject to capacity. The additional 1,500 dwellings tested through Development Scenario 6 is acknowledged in the supporting text of the adopted Local Plan allocation but is not in the allocation itself. One additional site was incorporated into Ramsey spatial planning area and carried through into the adopted Local Plan. Six additional sites were proposed in Key Service Centres and five sites were included in the new Local Service Centres category to reinforce their role in the development strategy and provide more certainty over the deliver of proportion of growth targeted in Key Service Centres, Local Service Centres and Small Settlements in the development strategy as a whole. These were subject to change through the Proposed Main Modifications as set out below.

Proposed Main Modifications Consultation (2018-2019)

- 5.70** The Proposed Main Modifications 2018 Sustainability Appraisal screened all the proposed main modifications to consider whether the implications would have a significant impact on achieving sustainability objectives. For those where the screening indicated that the proposed main modification may change the previous sustainability appraisal conclusion a further detailed appraisal was completed. To give a comprehensive picture of the evolution of the affected policy/ allocation this presented the original sustainability appraisal of each policy/ allocation subject to a proposed main modification along with the appraisals undertaken at the Draft Consultation 2017 stage, the appraisal of significant changes made at the Proposed Submission Local Plan stage and then the appraisal of the proposed main modification.
- 5.71** The proposed main modifications were put forward by the Inspector examining the Local Plan as necessary to make the plan sound and legally compliant. As such there were no reasonable alternatives considered at this stage although the proposed main modifications were published for statutory consultation from 10 December 2018 to 29 January 2019 providing the opportunity for any interested party to put forward alternative approaches for the Inspector's consideration. Representations were made to the Inspector that Sibson Aerodrome and Gifford's Park should be considered as alternatives and concerns about the adequacy of the sustainability appraisal process were repeated. Nonetheless, having considered the various representations made in response to both the Proposed Main Modifications and the sustainability appraisal of those Modifications, the Inspector's final report concluded that the site choices in the Local Plan were appropriate and that the Sustainability Appraisal was adequate.
- 5.72** The removal of the Local Service Centres policy and associated site allocations and changes to RGE Engineering, Godmanchester and George Street, Huntingdon do not measurably affect the in-combination effects of the strategy for development (adopted Local Plan policy LP2). The removal of allocations does reduce the certainty of housing provision within specific settlements such as Local Service Centres; however, this has a neutral impact overall as the Development Strategy still seeks to permit approximately a quarter of all housing development within Key Service Centres and Small Settlements. Removal of Former Car Showroom, St Ives and Main Street Huntingdon reduces development in areas at higher flood risk, but also produce a neutral impact overall as the Local Plan Development Strategy seeks to permit approximately three quarters of all housing development within Spatial Planning Areas. Further housing supply to meet need can still be achieved through windfall development (as illustrated through main

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

modifications to policy LP2 (proposed main modification MM1)) and the application of policies LP2 Strategy for Development; LP 7 Spatial Planning Areas; LP 8 Key Service Centres; LP 10 Small Settlements (adopted LP9) and LP 30 Rural Exceptions Housing (adopted LP28). The inclusion of a Country Park extension will still reduce recreational pressure on Portholme SAC and SSSI by providing increased publicly accessible green space and provide additional recreational activities suitable for a growing population and support improved biodiversity. The amended LP5 also positively impacts upon the in-combination effects of the Local Plan and increases the emphasis on ensuring development is safe for its lifetime from flood risk including that anticipated through climate change.

- 5.73** The adopted Local Plan is based on reasonable alternatives chosen at each stage of its preparation combined with the main modifications put forward by the Inspector. These are all deemed to be necessary to ensure that the Local Plan forms a sound, robust plan for the district.

6 How will the environmental and sustainability effects be monitored?

- 6.1** Regulation 16 (4)(e) of the SEA Regulations requires the identification of the measures taken to monitor the significant environmental effects of the implementation of the plan. This enables the identification of unforeseen adverse effects at an early stage and the ability of the Local Authority to undertake appropriate remedial action.
- 6.2** Table 5 below identifies the Monitoring Framework for the Local Plan showing the related spatial (Local Plan) objectives and related sustainability appraisal objectives. These monitoring Indicators were established in Stage E of the SA process and were included in the Final Sustainability Appraisal 2017 (pages 932-930). The monitoring indicators are as per the adopted Huntingdonshire Local Plan to 2036.
- 6.3** The Indicators will be monitored through the Council's Annual Monitoring Report and action taken where necessary to ensure effective delivery of the plan and related spatial and sustainability appraisal objectives. The delivery of site allocations within the plan will be monitored annually through the Council's housing trajectory.

Table 5 Monitoring Framework

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
LP 1 Amount of Development	<ul style="list-style-type: none"> Number and % of housing completions by settlement type Amount and % of employment development by settlement type Amount and % of completed office, retail and leisure development in town centres 	9	1, 8, 12, 13, 17, 18, 19, 20, 21	Huntingdonshire District Council, landowners, developers, registered providers
LP 2 Strategy for Development	<ul style="list-style-type: none"> Amount and % of completed retail, office and leisure development in town centres Amount and type of employment land available No. and % of housing completions by settlement type Amount and % of employment development by settlement type CIL receipts/expenditure monitoring S106 monitoring 	1, 9, 11, 15, 17, 20, 23, 25	1, 4, 5, 6, 8, 12, 18, 21	Huntingdonshire District Council, Cambridgeshire & Peterborough Combined Authority (Business Board), landowners, developers, Cambridgeshire County Council, infrastructure and service providers

6 How will the environmental and sustainability effects be monitored?

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
	<ul style="list-style-type: none"> Gross no. and % new dwellings on previously developed land Amount and % of employment floorspace developed on previously developed land 			
LP 3 Green Infrastructure	<ul style="list-style-type: none"> Losses to biodiversity habitat Additions to biodiversity habitat Total change in biodiversity habitat 	21, 25	4, 5, 12	Huntingdonshire District Council, Cambridgeshire County Council, town and parish councils, environmental protection agencies, landowners, developers
LP 4 Contributing to Infrastructure Delivery	<ul style="list-style-type: none"> Annual CIL receipts/ expenditure monitoring S106 monitoring Rolling update of GIIDP Completion of A14 trunk road upgrade Completion of A428 trunk road upgrade between Black Cat and Caxton Gibbet junctions Provision of additional capacity at Huntingdon, Oldhurst, Ramsey, Somersham and St Neots Waste Water Treatment Works 	12, 15, 16, 20	12, 13, 14, 17, 20, 21	Huntingdonshire District Council, Cambridgeshire County Council, town and parish councils, landowners, developers, registered providers, infrastructure and service providers
LP 5 Flood Risk	<ul style="list-style-type: none"> Number of planning permissions granted contrary to advice of Environment Agency on flooding or water quality grounds 	2	3	Huntingdonshire District Council, Landowners, developers, registered providers, Environment Agency
LP 6 Waste Water Management	<ul style="list-style-type: none"> Number of planning permissions granted contrary to advice of Environment Agency on flooding or water quality grounds 	24	2, 3	Huntingdonshire District Council, Environment Agency, Natural England, Anglian Water, developers, infrastructure and service providers
LP 7 Spatial Planning Areas	<ul style="list-style-type: none"> No. and % of housing completions by settlement type 	9	1, 8, 12, 13, 17, 18, 19, 20, 21	Huntingdonshire District Council, landowners, developers, registered providers

How will the environmental and sustainability effects be monitored? 6

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
	<ul style="list-style-type: none"> Amount and % of employment development by settlement type Amount and % of completed office, retail and leisure development in town centres 			
LP 8 Key Service Centres	<ul style="list-style-type: none"> No. and % of housing completions by settlement type Amount and % of employment development by settlement type 	20	1, 8, 12, 13, 17, 18, 20, 21	Huntingdonshire District Council, landowners, developers, registered providers
LP 9 Small Settlements	<ul style="list-style-type: none"> No. and % of housing completions by settlement type Amount and % of employment development by settlement type 	21	1	Huntingdonshire District Council, landowners, developers, registered providers
LP 10 The Countryside	<ul style="list-style-type: none"> No. of planning permissions granted on unallocated sites on grade 1 & 2 agricultural land 	21	1	Huntingdonshire District Council, landowners, developers, registered providers
LP 11 Design Context	<ul style="list-style-type: none"> No. of applications granted for large scale major development supported by an appropriate masterplan or design code 	2, 4, 14, 20, 21, 22	6, 7	Huntingdonshire District Council, landowners, developers, registered providers
LP 12 Design Implementation	<ul style="list-style-type: none"> % of dwellings completed at specified densities Average household water consumption 	2, 4, 14, 20, 21, 22, 23	6, 7, 8, 10, 11, 16	Huntingdonshire District Council, landowners, developers, registered providers
LP 13 Placemaking	<ul style="list-style-type: none"> No. of applications granted for large scale major development supported by an appropriate masterplan or design code 	2	6, 8, 16	Huntingdonshire District Council, landowners, developers, registered providers
LP 14 Amenity	<ul style="list-style-type: none"> No. of applications refused where grounds of refusal included detriment to neighbouring properties 	24	10, 16	Huntingdonshire District Council, landowners, developers, registered providers
LP 15 Surface Water	<ul style="list-style-type: none"> No. of planning permissions granted contrary to the advice 	2	2, 3	Huntingdonshire District Council, Cambridgeshire

6 How will the environmental and sustainability effects be monitored?

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Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
	of Environment Agency on flooding or water quality grounds			County Council as Lead Local Flood Authority, landowners, developers, registered providers
LP 16 Sustainable Travel	<ul style="list-style-type: none"> No. and % of housing completions by settlement type No. and % of planning permissions granted for major development supported by a Transport Assessment, Transport Statement and/or Travel Plan 	14, 20	21	Huntingdonshire District Council, landowners, developers, registered providers
LP 17 Parking Provision and vehicle Movement	<ul style="list-style-type: none"> Number and % of planning permissions for new main town centre uses of over 600m² net internal floorspace achieving at least one cycle space for every 25m² of net internal floorspace Number of new homes permitted with no off-street parking 	2	16	Huntingdonshire District Council, landowners, developers, registered providers
LP 18 Established Employment Areas	<ul style="list-style-type: none"> Amount of floorspace developed for employment by type in Established Employment Areas Losses of employment floorspace in Established Employment Areas to non-employment uses 	5	18, 19	Huntingdonshire District Council, landowners, developers
LP 19 Rural Economy	<ul style="list-style-type: none"> Amount of floorspace developed for employment by type (gross and net in m² in the countryside) No. of planning permissions granted for tourism, sport and recreation in the countryside 	5, 10	19	Huntingdonshire District Council, landowners, developers
LP 20 Homes for Rural Workers	<ul style="list-style-type: none"> No. of housing completions for rural workers 	10	14, 15	Huntingdonshire District Council, landowners, developers

How will the environmental and sustainability effects be monitored? 6

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
LP 21 Town Centre Vitality and Viability	<ul style="list-style-type: none"> Total amount of completed retail, office and leisure development Amount and % of completed retail, office and leisure development in town centres 	5, 9	6, 7, 19	Huntingdonshire District Council, landowners, developers
LP 22 Local Services and Community Facilities	<ul style="list-style-type: none"> Amount and % of completed retail, office and leisure development (gross and net) Amount of completed floorspace for other use classes (net) 	15, 16, 20	17, 18, 19, 20	Huntingdonshire District Council, landowners, developers, town & parish councils
LP 23 Tourism and Recreation	<ul style="list-style-type: none"> Number of permissions granted for tourism, sport and recreation in the countryside 	5, 10	6, 7, 12, 13, 17, 19	Huntingdonshire District Council, landowners, developers
LP 24 Affordable Housing Provision	<ul style="list-style-type: none"> No. and % affordable housing completions (gross) 	3	14, 15	Huntingdonshire District Council, landowners, developers, registered providers, Homes England
LP 25 Housing Mix	<ul style="list-style-type: none"> Dwelling completions by number of bedrooms No. of self build and custom build dwellings completed Number, % and tenure of affordable housing completions (gross) 	3, 8, 18, 19	14, 15	Huntingdonshire District Council, landowners, developers, registered providers
LP 26 Specialist Housing	<ul style="list-style-type: none"> Amount of C2 floorspace & no. of bedrooms completed for older people and other residents Number of self-contained (C3) specialist housing units provided by tenure 	19	14, 15, 21	Huntingdonshire District Council, landowners, developers, registered providers
LP 27 Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> No. of Gypsy & Traveller pitches delivered Number of Travelling Showpeople plots delivered 	18	14, 15	Huntingdonshire District Council, landowners, developers, registered providers, travelling community
LP 28 Rural Exceptions Housing	<ul style="list-style-type: none"> Number of affordable homes completed through rural exceptions schemes 	18	14, 15	Huntingdonshire District Council, landowners, developers, registered providers, parish councils

6 How will the environmental and sustainability effects be monitored?

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
LP 29 Health Impact Assessment	<ul style="list-style-type: none"> No. and % of planning permissions granted for large scale development with a supporting rapid Health Impact Assessment No. and % of planning permissions granted for large scale major development with a supporting full Health Impact Assessment 	4	12	Huntingdonshire District Council, landowners, developers, registered developers
LP 30 Biodiversity and Geodiversity	<ul style="list-style-type: none"> Losses to biodiversity habitat Additions to biodiversity habitat Total change in biodiversity habitat Total number and % of Local Sites where positive conservation management is being or has been implemented during the last five years (Single Data List Indicator Ref 160) % of SSSIs in favourable, unfavourable recovering, unfavourable no change, unfavourable declining, destroyed/part destroyed condition 	21	4, 5	Huntingdonshire District Council, Natural Cambridgeshire Local Nature Partnership, The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Cambridgeshire and Peterborough Biodiversity Partnership, Natural England, landowners, developers, registered providers
LP 31 Trees, Woodland, Hedges and Hedgerows	<ul style="list-style-type: none"> Number of applications refused on the basis of impact on trees, woodland, hedges and hedgerows 	21	5	Huntingdonshire District Council, Cambridgeshire and Peterborough Biodiversity Partnership, Natural England, landowners, developers, registered providers
LP 32 Protection of Open Space	<ul style="list-style-type: none"> Open space managed to Green Flag award standard No. of planning applications permitted involving the loss of open space which is not to be replaced offsite, or a financial contribution made 	16	4, 12	Huntingdonshire District Council, Sport England, landowners, developers, registered providers
LP 33 Rural Buildings	<ul style="list-style-type: none"> No. and % of planning applications refused on 	10	6	Huntingdonshire District Council, landowners,

How will the environmental and sustainability effects be monitored? 6

Sustainability Appraisal (HLP 2036) Post-Adoption Statement

Policy	Indicators	Related spatial objectives	Related SA objectives	Responsible agencies
	grounds of impact on the countryside			developers, registered providers
Chapter 8 Conserving and Enhancing the Environment - Heritage Strategy	<ul style="list-style-type: none"> No. of conservation character assessments reviewed within the last five years 	21	6, 7	Huntingdonshire District Council, landowners, developers, registered providers, Historic England, Cambridgeshire County Council
LP 34 Heritage Assets and their Settings	<ul style="list-style-type: none"> Number and % of planning applications refused on grounds of impact on heritage assets 	21	6, 7	Huntingdonshire District Council, landowners, developers, registered providers
LP 35 Renewable and Low Carbon Energy	<ul style="list-style-type: none"> Permitted renewable energy capacity in MW Completed renewable energy capacity in MW 	21	6, 7, 8	Huntingdonshire District Council, landowners, developers, registered providers
LP 36 Air Quality	<ul style="list-style-type: none"> Number of planning permissions granted which require a low emissions strategy 	24	9, 10	Huntingdonshire District Council, landowners, developers, registered providers
LP 37 Ground Contamination and Groundwater Pollution	<ul style="list-style-type: none"> Number of planning permissions granted with an agreed contamination mitigation strategy Number of planning permissions for the specified development types granted in a SPZ 1 where adequate safeguards against possible contamination have not been agreed 	24	2, 10	Huntingdonshire District Council, landowners, developers, registered providers
LP 38 Water Related Development	<ul style="list-style-type: none"> No. of planning permissions granted contrary to the advice of the Environment Agency on flooding or water quality grounds 	10	2, 3, 5, 10, 14	Huntingdonshire District Council, landowners, developers, registered providers, Environment Agency